



DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

SECRETARY

Certified Mail No.:

Activity No. PER20020007

Agency Interest 1096

Mr. George A. McGowan
Plant Manager
Monsanto Company
P.O. Box 174
Luling, Louisiana 70070

RE: Part 70 Operating Permit Renewal/Modification, CYA and ACL Units, Luling Plant,
Monsanto Company, Luling, St. Charles Parish, Louisiana

Dear Mr. McGowan:

This is to inform you that the Part 70 operating permit renewal/modification for the above referenced facility has been approved under LAC 33:III.501. The submittal was approved on the basis of the application submitted and the approval in no way relieves the applicant of the obligation to comply with all applicable requirements.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the _____ of _____, 2011, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number cited below and the Agency Interest Number 2638 should be referenced in future correspondence regarding this facility.

Done this _____ day of _____, 2006.

Permit No.: 2533-V3

Sincerely,

Chuck Carr Brown, Ph. D.
Assistant Secretary

CCB:mv
c: US EPA Region VI

ENVIRONMENTAL SERVICES

: PO BOX 4313, BATON ROUGE, LA 70821-4313

P:225-219-3181 F:225-219-3309

WWW.DEQ.LOUISIANA.GOV

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
MONSANTO COMPANY / LULING PLANT - CYA AND ACL UNITS
PROPOSED PART 70 AIR OPERATING PERMIT RENEWAL & MODIFICATION

The LDEQ, Office of Environmental Services, is accepting written comments on Part 70 Air Operating Permit Renewal and Modification for Monsanto Company, P.O. Box 174 Luling, LA 70070 for the Luling Plant, CYA and ACL Units. **The facility is located approximately one mile east of Luling between LA Hwy. 18 (River Road) and U.S. Hwy. 90, St. Charles Parish.**

Monsanto Company produces a variety of products at its Luling Plant. Manufacturing units include disodium iminodiacetate, glyphosate, phosphorus trichloride, cyanuric acid (CYA), and chlorinated cyanuric acid (ACL).

Monsanto Company requested the renewal and modification of its part 70 air operating permit 2533-V2. This permit modification includes the addition of two (2) insignificant activities, which are the Wastewater tank and Relief Halter. In addition, this Permit modification removes emission source 1-00, Hydrolizer 740, and updates regulations applicability for several sources to better reflect actual conditions.

Estimated emissions from the crude CYA Unit in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	4.46	4.17	-0.29
SO ₂	1.16	1.17	+0.01
NO _x	81.56	81.56	-
CO	36.84	36.84	-
VOC	1.52	1.52	-

Estimated emissions from the ACL Unit in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	12.61	12.61	-
SO ₂	0.02	0.02	-
NO _x	3.50	3.50	-
CO	6.57	6.57	-
VOC	0.18	0.18	-

Written comments, written requests for a public hearing, or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Thursday, July 13, 2006.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The proposed permit, statement of basis and the revised expanded "IT Decision" questions are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). Additional copies may be reviewed at the St Charles Parish Library – Headquarters located at 105 Lakewood Drive, Luling LA 70070.

Inquiries or requests for additional information regarding this permit action should be directed to Dr. Marta Vasquez, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3130.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at maillistrequest@ldeq.org or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the proposed permit and statement of basis can be viewed at the LDEQ permits public notice webpage at www.deq.state.la.us/news/PubNotice/ and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at http://www.state.la.us/ldbc/listservpage/ldeq_pn_listserv.htm.

All correspondence should specify AI Number 1096, Permit Number 2533-V3, and Activity Number PER20020007.

Publication Date: Thursday, June 8, 2006

AIR PERMIT BRIEFING SHEET
PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CYA and ACL UNITS; AI No. 1096; PER20020007
MONSANTO COMPANY
LULING, ST. CHARLES PARISH, LOUISIANA

I. BACKGROUND

Monsanto Company produces a variety of products at its Luling Plant. Manufacturing units include disodium iminodiacetate, glyphosate, phosphorus trichloride, cyanuric acid (CYA), and chlorinated cyanuric acid (ACL). The Luling Plant manufactured acetaminophen until the year 2004 when its production stopped.

Expansions of both the CYA and ACL Units are addressed in PSD-LA-623, issued February 27, 1998. Prevention of Significant Deterioration review was required for PM₁₀ and CO emissions. Best Available Control Technology (BACT) requirements are outlined in Table 2 for the affected emission sources, and the PSD's specific conditions are incorporated into the Part 70 Specific Conditions.

With respect to the CYA Unit, the CYA and ACL Units' initial Title V, Permit No. 2533-V0, granted April 24, 1998:

1. Increased production capacity from 90 to 140 million pounds per year by adding a new process train which included a pyrolysis kiln, offgas scrubber and concentrator, urea holding tank, and product storage silo;
2. Replaced the existing urea melting tank;
3. Added a new CYA purification process consisting of two hydrolyzers, a hydrator, a filtration system, and a wet cake railcar loading facility;
4. Added a dust collector to control dust from railcar loading;
5. Added a scrubber to control ammonia emissions from the new urea melting tank;
6. Added a scrubber to control ammonia emissions from the existing and new urea holding tanks when the kilns are down for maintenance; and
7. Added a new emergency ammonia scrubber to control the emergency feed diversion from the thermal oxidizer.

Subsequently, the equipment needs for the expansion project were better defined. With Permit No. 2533-V1, dated August 19, 1999, Monsanto removed several pieces of proposed equipment from the permit, including the new Urea Hold Tank (701) and the Urea Melting Tank (2-124). Additionally, PM₁₀ emissions from the CYA Thermal Oxidizers No. 1 and 2 (7-82 and 32-96) were increased slightly; startup emissions from the CYA Kilns (15-72 and 3-97) and oxidizers were added as General Condition XVII Activities; Part 70 Specific Condition 4 (now 2) and State Only Specific Conditions 1 and 2 (now 2) were clarified to indicate that startup is not considered to be part of operation; and removed DRE testing for ammonia from the Urea Unloading Tank Scrubber and Urea Storage Tank Scrubber (2-97 and 20-97).

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LULING, ST. CHARLES PARISH, LOUISIANA

With respect to the ACL Unit, Permit No. 2533-V0:

1. Debottlenecked the existing facility to increase the production capacity from 45 to 60 million pound per year. The project involved upgrading the dissolving system, acidification system, chlorination system, drying system, and dry-end sizing and packaging system.
2. Replaced the dryer system, product receiver, and airvey system;
3. Added a new cooling tower and a new chilled water system;
4. Relocated and upgraded the chlorine railcar unloading station;
5. Added a new chlorine surge tank as part of the chlorine pipeline project; and
6. Relocated the caustic and sulfuric acid unloading spots.

With permit 2533-V1, Monsanto reduced chlorine emissions by routing the Steam Jet (3-96) to the ACL Chlorine Scrubber (1-72).

With respect to Permit No. 2533-V2:

1. Debottlenecked one CYA purification train by adding a Hydrolyzer (Equipment No. 740), increasing the size of the Pure CYA Filter (Equipment No. 752), and making minor modifications to the conveying equipment. The Hydrolyzer (Emission Point 1-00) installed upstream of Hydrolyzer 743, thus, the capacity of the crude CYA increased from 140 to 180 million pounds per year;
2. Changed the maximum kiln urea feed rate from 34 to 38 gpm, as measured on an hourly average basis. Stack tested the CYA thermal oxidizers to demonstrate compliance with permitted limits prior to sustained operations under these conditions;
3. Transferred the requirement to maintain the water flow to the spray nozzles inside Hydrolyzer 743 (9-97) at a minimum of 3 gpm during solid filling to Hydrolyzer 740 (1-00). Added solids to Hydrolyzer 740 instead of to Hydrolyzer 743;
4. Removed the limit imposed on the thermal oxidizers' stack temperature;
5. Removed language requiring the submittal of a quarterly deviation summary report as this requirement is redundant to Part 70 General Condition R;
6. Removed State Only Specific Conditions 4 and 5 in Permit 2533-V2. Both conditions pertain to portions of the kiln-offgas-scrubber-system. This equipment is not a pollution control device, but rather a product recovery system; and
7. Revised the maximum pounds per hour and tons per year of PM₁₀ and CO emissions.

II. ORIGIN

Monsanto Company submitted an application and Emission Inventory Questionnaire (EIQ) dated October 15, 2002, requesting a Part 70 Permit modification. Additional information dated May 17, 2006 and May 22, 2006 was also received.

AIR PERMIT BRIEFING SHEET
PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CYA and ACL UNITS; AI No. 1096; PER20020007
MONSANTO COMPANY
LULING, ST. CHARLES PARISH, LOUISIANA

III. DESCRIPTION

The CYA and ACL Units are owned by Occidental Chemical Corporation and operated by Monsanto. The facility consists of three (3) main processes: crude CYA production (two trains), CYA purification (two trains), and ACL production (one train). For permitting purposes, one of the CYA purification trains is located in the CYA Unit, and one is located in the ACL Unit.

In the crude CYA process, a concentrated urea solution is fed to one of the two (2) kilns where it is pyrolyzed to crude CYA. Offgas from each kiln is scrubbed for product recovery and then sent to one of two thermal oxidizers (each oxidizer is dedicated to a particular kiln). The oxidizers destroy ammonia present in the offgas stream and generate steam from the waste's heat of combustion. This area also contains wet scrubbers to control ammonia from urea remelt tank, two urea hold tanks, and the diverted thermal oxidizer feed.

Next, crude CYA is either router to one to the two CYA purification trains or loaded into railcars for transportation to and offsite ACL facility. Particulate emissions from the railcar loading operation are controlled by a dust collector. The CYA remaining onsite is then purified via hydrolysis and hydration.

Once the CYA is purified, it reacts with caustic to prepare for chlorination. In the ACL Unit, CYA is chlorinated, neutralized, dewatered, dried, and packaged. Emissions from all chlorination equipment are controlled via caustic scrubbing, while particulate emissions from drying, product transfer, and packaging operations are controlled with dust collectors.

This permit adds two (2) insignificant activities. These are Wastewater tank and a relief header and removes emission source 1-00, Hydrolizer 740.

Estimated emissions from the crude CYA Unit in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	4.46	4.17	-0.29
SO ₂	1.16	1.17	+0.01
NO _x	81.56	81.56	-
CO	36.84	36.84	-
VOC*	1.52	1.52	-

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CYA and ACL UNITS; AI No. 1096; PER20020007
MONSANTO COMPANY
LULING, ST. CHARLES PARISH, LOUISIANA

*VOC (non-TAP), (TPY):	Before	After	Change
Urea	1.14	1.14	-
Total	1.14	1.14	-
Non VOC TAPs, (TPY)	Before	After	Change
Ammonia	71.79	71.79	-
Total	71.79	71.79	-
Other VOC (non-TAP), (TPY):	Before	After	Change
Total	1.52	1.52	-

Estimated emissions from the ACL Unit in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	12.61	12.61	-
SO ₂	0.02	0.02	-
NO _x	3.50	3.50	-
CO	6.57	6.57	-
VOC	0.18	0.18	-
Non VOC TAPs, (TPY)	Before	After	Change
Chlorine	9.56	9.56	-
Hydrochloric Acid	0.01	0.01	-
Sulfuric Acid	<0.001	<0.001	-
Total	9.57	9.57	-
Other VOC (non-TAP), (TPY):	Before	After	Change
	0.18	0.18	-

The toxic air pollutants emitted do not exceed the Louisiana Toxic Air Pollutant Ambient Air Quality Standard.

IV. TYPE OF REVIEW:

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations. New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) apply. Prevention of Significant Deterioration (PSD) and Non-attainment New Source Review NNSR do not apply.

The Luling Plant is classified as a major source of Toxic Air Pollutants.

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LULING, ST. CHARLES PARISH, LOUISIANA

V. CREDIBLE EVIDENCE

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. PUBLIC NOTICE:

A notice requesting public comment on the permit was published in the *Advocate*, Baton Rouge, Louisiana, on XXX XX, 2006 and *The St Charles Herald-Guide*, St. Charles, Louisiana, on XXX XX, 2006. The public notice was sent to persons included in the Office of Environmental Services Public Notice Mailing List on XXX XX, 2006. The proposed permit was also submitted to US EPA Region VI. All comments will be considered prior to the final permit decision.

VII. Effects on Ambient Air

Dispersion Model(s) Used: ISCST2

Pollutant	Time Period	Calculated Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$)	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard) ($\mu\text{g}/\text{m}^3$)
PM ₁₀	Annual	0.49	50
	24-hour average	4.71	150
CO ¹	8 hour average	12.25	10,000
	1 hour average	30.42	40,000
Chlorine ²	8 hour average	17.87	35.70
Ammonia ²	8 hour average	42.56	640.00

¹ Modeling was associated with PSD-LA-623.

² Ambient air standard pursuant to LAC 33:III.5112.

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**CYA and ACL UNITS; AI No. 1096; PER20020007
MONSANTO COMPANY
LULING, ST. CHARLES PARISH, LOUISIANA**

VIII. General Condition XVII Activities

Monsanto has identified activities that meet the requirements of General Condition XVII. These include:

ID	Work Activity	Emission Rates - tons				
		NO_x	CO	VOC	NH₃	Urea
7-82	CYA Thermal Oxidizer startup/shutdown	0.65	0.78			
32-98	CYA Thermal Oxidizer startup/shutdown	0.65	0.78			
-	Scrubber 142	0.03		0.03	0.48	0.06
-	Scrubber 192	0.03		0.03	0.48	0.06

IX. Insignificant Activities

ID No.:	Description	Capacity (gal)	Citation
Tank 562	Diesel Fuel Tank	269	LAC 33:III.501.B.5
Tank 865	Diesel Fuel Tank	146	LAC 33:III.501.B.5
Tank 866	Diesel Fuel Tank	1000	LAC 33:III.501.B.5
Tank 219	Pure Slurry Tank	8087	LAC 33:III.501.B.5
232	Caustic Storage	20,561	LAC 33:III.501.B.5
222	Caustic Receiving	20,532	LAC 33:III.501.B.5
-	Pressurized Aqua Ammonia Tank	11,000	LAC 33:III.501.B.5
Tank 780	Wastewater Tank	-	LAC 33:III.501.A.3
-	Relief Header	-	LAC 33:III.501.D

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CYA and ACL UNITS; AI No. 1096; PER20020007
 MONSANTO COMPANY
 LULING, ST. CHARLES PARISH, LOUISIANA

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No. :	Description	LAC 33:III, Chapter																			
		5▲	9	11	13	15	2103	2107	2108	2111	2113	2115	2121	2125	2149	2153	22*	29*	51*	56	59
GRP19	Entire Facility	1	1							1	1					2		1	1	1	1
EQT 50	15-72 - #1 CYA Kiln	1		1	1	2															
RLP02	7-82 - CYA Thermal Oxidizer No. 1 Vent	1		1	1	2															
RLP03	1-96 - #1 Kiln Discharge Hood Jacket Vent	1		1	1	2															
RLP04	2-96 - #1 Kiln Process Duct Jacket Vent	1		1	1	2															
RLP05	32-96 - CYA Thermal Oxidizer No. 2 Vent	1		1	1	2															
FUG02	39-96 Fugitive Emissions from CYA Plant			1	1	2										2					
EQT 51	2-87 - Urea Unloading Tank Scrubber																				1
EQT 52	3-97 - #2 CYA Kiln	1		1	1	2															
RLP06	4-97 - #2 Kiln Discharge Hood Jacket Vent	1		1	1	2															
RLP07	5-97 - #2 Kiln Process Duct Jacket Vent	1		1	1	2															
EQT 53	7-97 - CYA Loading Dust Suppression System	1		1																	
EQT 54	9-97 Hydrolizer 743	3		1																	
EQT 55	10-97 - Hydrolizer 744	1		1																	
EQT 56	20-97 - Urea Storage Tank Scrubber																				1
EQT 57	34-97 - Hydron 747																				3
EQT 58	35-97 - Pure CYA Storage Tank 770																				3

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CYA and ACL UNITS; AI No. 1096; PER20020007
MONSANTO COMPANY
LULING, ST. CHARLES PARISH, LOUISIANA

CYA Unit

* The regulations indicated above are State Only regulations.

- ▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
-The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CVA and ACL UNITS; AI No. 1096; PER20020007
 MONSANTO COMPANY
 LULING, ST. CHARLES PARISH, LOUISIANA

ACL Unit

XI. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No. :	Description	LAC 33:III.Chapter																		
		5▲	9	11	13	15	2103	2107	2108	2111	2113	2115	2125	2149	2153	22*	29*	51*	56	59
GRP19	Entire Facility			1	1					1	1						1	1	1	1
EQT 59	1-72 - ACL Chlorine Scrubber																			
EQT 60	2-72 - ACL Dryer Exhaust																			
EQT 61	5-72 - Hydrolizer 206																			
EQT 62	1-86 - ACL Receiver																			
EQT 63	2-86 - Vent Dust Collector																			
EQT 64	4-87 - Dechlorinator/Neutralizer																			
EQT 65	9-88 - ACL Vacuum Scrubber																			
EQT 66	11-80 - ACL Conditioner																			
EQT 67	2-94 - ACL Pack. & Rework Dust Collector																			
EQT 68	1-95 - ACL Hydrolizer 211																			
EQT 69	2-95 - ACL Hydrolizer 212																			
EQT 70	4-96 - Sulfuric Acid Tank 210																			
EQT 71	5-96 - HCL Storage Tank Scrubber Vent																			
FUG03	40-96 - Fugitive Emissions from ACL Plant																			
EQT 72	26-97 - Hydrator 213																			
EQT 73	27-97 - Pure Slurry Tank 225																			
EQT 74	28-97 - Dissolver Tank 224																			
EQT 75	29-97 - Feed Surge Tank 236																			
EQT 76	30-97 - Chlorinator Feed Tank 240																			

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 LULING, ST. CHARLES PARISH, LOUISIANA

ACL Unit

XI. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No. :	Description	LAC 33:III. Chapter																		
		5▲	9	11	13	15	2103	2107	2108	2111	2113	2115	2121	2125	2149	2153	22*	29*	51*	56
EQT 77	31-97 - ACL Cooling Tower 101																			
EQT 78	32-97 - ACL Jet Cooling Tower 263																			
EQT 79	33-97 - ACL Cooling Tower 930																			

* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
 -The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CYA and ACL UNITS; AI No. 1096, PER20020007
 MONSANTO COMPANY
 LULING, ST. CHARLES PARISH, LOUISIANA

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

		CYA unit												40 CFR 63												40 CFR							
		40 CFR 60						40 CFR 61						40 CFR 63																			
		A	D	Da	Db	Dc	K	Ka	Kb	Kb III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	U	XX	YY	FFFF	DDDDD	64	68	82	
GRP19	Entire Facility																																
EQT 50	15-72 - #1 CYA Kiln																																
RLP02	7-82 - CYA Thermal Oxidizer No. 1 Vent																																
RLP03	1-96 - #1 Kiln Discharge Hood Jacket Vent																																
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EQT 55	10-97 - Hydrolizer 744																																
EQT 56	20-97 - Urea Storage Tank Scrubber																																

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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MONSANTO COMPANY
LULING, ST. CHARLES PARISH, LOUISIANA

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

	CYA unit	40 CFR 60																40 CFR 61						40 CFR 63						40 CFR					
		A	D	Da	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	U	XX	YY	FFFF	DDDD	DDDDDD	64	68	82			
EQT 57	34-97 - Hydrator 747																																		
EQT 58	35-97 - Pure CYA Storage Tank 770																																		

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
-The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank - The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CYA and ACL UNITS; AI No. 1096; PER20020807
 MONSANTO COMPANY
 LULING, ST. CHARLES PARISH, LOUISIANA

XI. Table 1. Applicable Louisiana and Federal Air Quality Requirements

		40 CFR 60												40 CFR 61												40 CFR						
		A	D	Da	Db	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	U	XX	YY	FFFF	DDDD	64	68	82
ACL Unit																																
GRP19	Entire Facility																															
EQT 59	1-72 – ACL Chlorine Scrubber																															
EQT 60	2-72 – ACL Dryer Exhaust																															
EQT 61	5-72 – Hydrolizer 206																															
EQT 62	1-86 – ACL Receiver																															
EQT 63	2-86 – Vent Dust Collector																															
EQT 64	4-87 – Dechlorinator/Neutralizer																															
EQT 65	9-88 – ACL Vacuum Scrubber																															
EQT 66	11-80 – ACL Conditioner																															
EQT 67	2-94 – ACL Pack & Rework Dust Collector																															
EQT 68	1-95 – ACL Hydrolizer 211																															
EQT 69	2-95 – ACL Hydrolizer 212																															
EQT 70	4-96 – Sulfuric Acid Tank 210																															
EQT 71	5-96 – HCL Storage Tank Scrubber Vent																															
FUG03	40-96 – Fugitive Emissions from ACL Plant																															
EQT 72	26-97 – Hydrator 213																															
EQT 73	27-97 – Pure Slurry Tank 225																															
EQT 74	28-97 – Dissolver Tank 224																															

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CYA and ACL UNITS; AI No. 1096; PER20020007
 MONSANTO COMPANY
 LULING, ST. CHARLES PARISH, LOUISIANA

XI. **Table 1. Applicable Louisiana and Federal Air Quality Requirements**

	ACL Unit	40 CFR 60																				40 CFR 61							40 CFR 63						
		A	D	Da	Db	Dc	K	Ka	Kb	I	II	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	U	XX	YY	FFFF	DDDD	DD	68	82		
EQT 75	29-97 - Feed Surge Tank	23	6																																
EQT 76	30-97 - Chlorinator Feed Tank	240																																	
EQT 77	31-97 - ACL Cooling Tower	101																																	
EQT 78	32-97 - ACL Jet Cooling Tower	263																																	
EQT 79	33-97 - ACL Cooling Tower	930																																	

KEY TO MATRIX

- 1 - The regulations have applicable requirements that apply to this particular emission source.
 - The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
GRP019 Entire Facility	Vapor Degreasers IAC 33:III.2125 40 CFR 61 Subpart FF – National Emission Standard for Benzene Waste Operations	EXEMPT - Degreasers are exempt per 2125.D DOES NOT APPLY – The Luling Plant does not generate benzene waste. Initial report per 40 CFR 61.357(a) is required [40 CFR 61.342(a)]. On March 4, 1993, Monsanto notified the EPA and LDEQ that the Luling Plant has no benzene present on site in wastes, products, by-products, or intermediates.
EQT 50 (15-72), RLP03 (1-96), RLP04 (2-96), EQT 52 (3-97), RLP06 (4-97), and RLP07 (5-97)	IAC 33:III.Chapter 15 – Emission Standards for Sulfur Dioxide	EXEMPT – Facility emits less than 100 tons per year of sulfur compounds measured as SO ₂ and is exempt from both the 2000 ppmv limitation established by LAC 33:III.1503.C and the continuous emissions monitoring requirement of LAC 33:III.1511.A.
RLP02 (7-82)	IAC 33:III.Chapter 15 – Emission Standards for Sulfur Dioxide	DOES NOT APPLY - This source burns natural gas/ therefore the only compliance requirement is to submit an initial notification by March 12, 2005. 40 CFR 63.7507(b). The initial notification was submitted on March 3, 2005. EXEMPT – Facility emits less than 100 tons per year of sulfur compounds measured as SO ₂ and is exempt from both the 2000 ppmv limitation established by LAC 33:III.1503.C and the continuous emissions monitoring requirement of LAC 33:III.1511.A.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
RLP02 (7-82) (Continued)	LAC 33:III.2115 – Waste Gas Disposal	EXEMPT – Waste gas streams have a combined weight of VOCs equal to or less than 100 pounds in any continuous 24-hour period.
	40 CFR 64 – Compliance Assurance Monitoring for Major Stationary Sources	EXEMPT – Per 40 CFR 64.2(3)(b)(1)(vi).
	NSPS Subpart Dc – Standards of Performance for Small Industrial-Commercial – Institutional Steam Generating Units [40 CFR 60.40c]	DOES NOT APPLY – Boiler was constructed prior to June 9, 1989, and has not been modified or reconstructed.
	40 CFR 63 Subpart DDDDD – National Emission Standards for Industrial Boilers and Process Heaters	DOES NOT APPLY - This source burns natural gas/ therefore the only compliance requirement is to submit an initial notification by March 12, 2005. 40 CFR 63.7507(b). The initial notification was submitted on March 3, 2005.
RLP05 (32-96)	LAC 33:III.Chapter 15 – Emission Standards for Sulfur Dioxide	EXEMPT – Facility emits less than 100 tons per year of sulfur compounds measured as SO ₂ and is exempt from both the 2000 ppmv limitation established by LAC 33:III.1503.C and the continuous emissions monitoring requirement of LAC 33:III.1511.A.
	LAC 33:III.2115 – Waste Gas Disposal	EXEMPT – Waste gas streams have a combined weight of VOCs equal to or less than 100 pounds in any continuous 24-hour period.
	40 CFR 64 – Compliance Assurance Monitoring for Major Stationary Sources	EXEMPT – Per 40 CFR 64.2(3)(b)(1)(vi).

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
RLP05 (32-96) (Continued)	NSPS Subpart Dc – Standards of Performance for Small Industrial-Commercial – Institutional Steam Generating Units [40 CFR 60.42c and 40 CFR 60.43c]	EXEMPT – Sulfur dioxide standards under 40 CFR 60.42c and particulate matter standards under 40 CFR 60.43c do no apply because the boiler does not combust coal, oil, or wood. Boiler combusts natural gas only.
FUG02 (39-96)	40 CFR 63 Subpart DDDDD – National Emission Standards for Industrial Boilers and Process Heaters	DOES NOT APPLY - This source burns natural gas/ therefore the only compliance requirement is to submit an initial notification by March 12, 2005. 40 CFR 63.7507(b). The initial notification was submitted on March 3, 2005.
EQT 57 (34-97) and EQT 58 (35-97)	LAC 33.III.2121 – Fugitive Emission Control	EXEMPT – Monitoring is not required for components which contact only a process liquid containing a VOC having a true vapor pressure equal to or less than 0.0435 psia at 68 degree Fahrenheit
	40 CFR Subpart VV – Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry	EXEMPT – Affected facility that produce heavy liquid chemicals only from heavy liquid feed or raw materials are exempt from 40 CFR 60.482
	40 CFR 60.489.(d)(3)	
	LAC 33.III.2103	DOES NOT APPLY – Contents have a true vapor pressure less than 1.5 psia at storage conditions.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels [40 CFR 60.110b(c)]	DOES NOT APPLY – Contents have a true vapor pressure less than 3.5 kPa (0.5 psia) at storage conditions.

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LULING, ST. CHARLES PARISH, LOUISIANA**

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT 53 (7-97)	40 CFR 64 – Compliance Assurance Monitoring for Major Stationary Sources	DOES NOT APPLY – Inlet stream to control device contains less than 100 TPY PM ₁₀ .
EQT 59 (1-72)	40 CFR 64 – Compliance Monitoring for Major Stationary Sources	EXEMPT – Per 40 CFR 64.2(3)(b)(1)(vi).
EQT 60 (2-72)	LAC 33:III.Chapter 15 – Emission Standards for Sulfur Dioxide	EXEMPT – Facility emits less than 100 tons per year of sulfur compounds measured as SO ₂ and is exempt from both the 2000 ppmv limitation established by LAC 33:III.1503.C and the continuous emissions monitoring requirement of LAC 33:III.1511.A.
	NESHAP for Source Categories Subpart DDDDD – Industrial, Commercial, and Institutional Boilers and Process Heaters [40 CFR 63.7506(b)]	DOES NOT APPLY – The dryer is a direct-fired heater and is therefore not subject to the requirements of 40 CFR 63 Subpart DDDDD.
EQT 63 (2-86), EQT 66 (11-90), and EQT 67 (2-94)	40 CFR 64 – Compliance Assurance Monitoring for Major Stationary Sources	DOES NOT APPLY – Inlet stream to control device contains less than 100 TPY PM ₁₀ .
EQT 73 (27-97), EQT 74 (28-97), EQT 75 (29-97), and EQT 76 (30-97)	LAC 33:III.2103	DOES NOT APPLY – Contents have a true vapor pressure less than 1.5 psia at storage conditions.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT 77 (31-97), EQT 78 (32-97), and EQT 79 (33-97)	NESHAP for Source Categories Subpart Q – Chromium Emissions from Industrial Process Cooling Towers [40 CFR 63.400(a)]	DOES NOT APPLY - No water treatment programs containing chromium compounds are at the facility.

40 CFR PART 70 GENERAL CONDITIONS

- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]

40 CFR PART 70 GENERAL CONDITIONS

H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:

1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];
2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];
3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and
4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]

I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit.

[Reference 40 CFR 70.6(a)(3)(ii)(B)]

J. Records of required monitoring shall include the following:

1. the date, place as defined in the permit, and time of sampling or measurements;
2. the date(s) analyses were performed;
3. the company or entity that performed the analyses;
4. the analytical techniques or methods used;
5. the results of such analyses; and
6. the operating conditions as existing at the time of sampling or measurement.

[Reference 40 CFR 70.6(a)(3)(ii)(A)]

K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Surveillance Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]

40 CFR PART 70 GENERAL CONDITIONS

- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]
- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Surveillance Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]
- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]
- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
 1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
 2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;
 3. increases in permitted emissions of Louisiana toxic air pollutants or of federal

40 CFR PART 70 GENERAL CONDITIONS

- hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;
4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;
 5. changes in emissions would not qualify as a significant modification; and
 6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]
- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Surveillance Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
 2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
 3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
 - a. Report by June 30 to cover January through March
 - b. Report by September 30 to cover April through June
 - c. Report by December 31 to cover July through September
 - d. Report by March 31 to cover October through December
 4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]

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- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]
- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
 1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
 2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
 3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
 4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
 5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
 6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]
- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or ~~system used on passenger buses using HCFC-22 refrigerant.~~ [Reference 40 CFR 82, Subpart B]
- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly

40 CFR PART 70 GENERAL CONDITIONS

average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

LOUISIANA AIR EMISSION PERMIT
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- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated October 15, 2002. Additionally information dated May 17, 2006 and May 22, 2006 was also received.
- IV. This permit shall become invalid, for the sources not constructed, if:
 - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.

- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The

LOUISIANA AIR EMISSION PERMIT
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appropriate Regional Office shall also be so notified within the same time frame.

- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Surveillance Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Surveillance Division with a written report as specified below.
 - A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
 - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
 - C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
 - 1. Report by June 30 to cover January through March
 - 2. Report by September 30 to cover April through June
 - 3. Report by December 31 to cover July through September
 - 4. Report by March 31 to cover October through December

**LOUISIANA AIR EMISSION PERMIT
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- D. Each report submitted in accordance with this condition shall contain the following information:
1. Description of noncomplying emission(s);
 2. Cause of noncompliance;
 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
 - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
 - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
 - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.
- XIII. ~~If samples are taken under Section XII-D above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.~~
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this

LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS

subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.

- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services, Air Permits Division, within ninety (90) days after the event, to amend this permit.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
 1. Generally be less than 5 TPY
 2. Be less than the minimum emission rate (MER)
 3. Be scheduled daily, weekly, monthly, etc., or
 4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:1.3901.

- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division
La. Dept. of Environmental Quality
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

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- XIX. Certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

General Information

AI ID: 1096 Monsanto Co - Luling Plant
Activity Number: PER20020007

Permit Number: 2533-V3

Air - Title V Regular Permit Minor Mod

General Information					
Also Known As:	ID	Name	User Group	Start Date	
	LA04924	Monsanto Agricultura	Air Permitting	08-05-2002	
	2520-00005	ADV#	Asbestos	01-16-2003	
	2520-0005	Monsanto Co - Luling Plant	CDS Number	08-07-1970	
	43-0420020	Monsanto Co - Luling Plant	Emission Inventory	03-03-2004	
	LAD001700756	Monsanto Co - Luling	Federal Tax ID	11-21-1999	
	PMT/PC/CA	GPRRA Baselines	Hazardous Waste Notification	08-18-1980	
	LAD001700756	Monsanto	Hazardous Waste Permitting	10-01-1997	
	LA0005266	LPDES #	Inactive & Abandoned Sites	08-04-1981	
	WP1251	WPC State Permit Number	LPDES Permit #	06-22-2003	
	LA-2216-L01	Radioactive Material License	LWDPS Permit #	06-25-2003	
	11085	X-Ray Registration Number	Radiation License Number	12-20-2000	
	GD-089-1769	Site ID #	Radiation X-ray Registration Number	09-08-2004	
	45673	Monsanto Ag Products Co	Solid Waste Facility No.	04-30-2001	
	48373	Monsanto Co	TEMPO Merge	03-15-2001	
	2520-00095	Toxic Emissions Data Inventory #	TEMPO Merge	03-15-2001	
	45006590	UST Facility ID (from UST legacy data)	Toxic Emissions Data Inventory #	01-01-1991	
			Underground Storage Tanks	10-12-2002	
				Main Phone:	9857858211
	12501 River Rd (a portion of) Luling, LA 70070	PO Box 174 Luling, LA 700700174	Location of Front Gate:	29° 56' 34" N latitude, 90° 20' 55" W longitude, Coordinate Method: GPS Code (Pseudo Range) Differential, Coordinate Datum: NAD83	
			Mailing Address:		
			Related People:		
Physical Location:	Name	Mailing Address	Phone (Type)	Relationship	
	Armand Bourque	PO Box 174 Luling, LA 700700174	9857856217 (WP)	Kairina Response Contact for	
	Roy Bread Jr.	12501 River Rd Luling, LA 70070	darren.p.claudate@n	Water Billing Party for	
	Darren Clouatre	12501 River Rd Luling, LA 70070	9857853586 (WP)	Radiation Safety Officer for	
	Darren Clouatre	12501 River Rd Luling, LA 70070	darren.p.claudate@n	Radiation Safety Officer for	
	Darren Clouatre	12501 River Rd Luling, LA 70070	9857853586 (WP)	Radiation Contact For	
	Darren Clouatre	12501 River Rd Luling, LA 70070	9857853845 (WF)	Radiation Contact For	
	Darren Clouatre	12501 River Rd Luling, LA 70070	9857853845 (WF)	Radiation Contact For	
	Allen R. Dent	12501 S River Rd Luling, LA 70070	9857853578 (WP)	Hazardous Waste Permit Contact For	

General Information

AI ID: 1096 Monsanto Co - Luling Plant

Activity Number: PER20020007

Permit Number: 2533-V3

Air - Title V Regular Permit Minor Mod

Related People:	Name	Mailing Address	Phone (Type)	Relationship
	Njeri A. Gichia George A. McGowan William Rhodes II William Rhodes II	PO Box 174 Luling, LA 700700174 PO Box 174 Luling, LA 700700174 PO Box 174 Luling, LA 700700174 PO Box 174 Luling, LA 700700174	9857858211 (WP) 9857853866 (WP) 9857853346 (WF)	Solid Waste Billing Party for Responsible Official for Air Permit Contact For Air Permit Contact For
Related Organizations:	Name	Address	Phone (Type)	Relationship
	Monsanto Co Monsanto Co Monsanto Co Monsanto Co Monsanto Co Monsanto Co CT Corporation System Occidental Chemical Co	PO Box 174 Luling, LA 700700174 PO Box 174 Luling, LA 700700174 8550 United Plaza Blvd Baton Rouge, LA 70809 PO Box 74 Hahnville, LA 700570074	5047853470 (WP) 5047853470 (WP) 5047853470 (WP) 5047853470 (WP) 5047853470 (WP) 5047853470 (WP) 5047853470 (WP)	Operates Air Billing Party for Water Billing Party for Haz. Waste Billing Party for Radiation License Billing Party for Radiation Registration Billing Party for Agent of Service for Owns
SIC Codes:		2869, Industrial organic chemicals, nec 2899, Chemical preparations, nec	5047836661 (WP)	

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to facupdate@la.gov.

INVENTORIES

AJ ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20020007
 Permit Number: 2533-V3
 Air - Title V Regular Permit Minor Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
EQT050	15-72 - #1 CYA Kiln		25 MM BTU/hr		8760 hr/yr (All Year)	
EQT051	2-97 - Urea Unloading Tank Scrubber		6000 ft^3/min		8760 hr/yr (All Year)	
EQT052	3-97 - #2 CYA Kiln		25 MM BTU/hr		8760 hr/yr (All Year)	
EQT053	7-97 - CYA Loading Dust Supression System		300 ft^3/min		2000 hr/yr (All Year)	
EQT054	9-97 - Hydrolyzer 743		1000 ft^3/min		8760 hr/yr (All Year)	
EQT055	10-97 - Hydrolyzer 744		1000 ft^3/min		8760 hr/yr (All Year)	
EQT056	20-97 - Urea Storage Tank Scrubber	40000 gallons		8760 hr/yr (All Year)		
EQT057	34-97 - Hydrator 747		20 ft^3/min		8760 hr/yr (All Year)	
EQT058	35-97 - Pure CYA Storage Tank 770	16500 gallons			8760 hr/yr (All Year)	
EQT059	1-72 - ACL Chlorine Scrubber		5600 ft^3/min		8760 hr/yr (All Year)	
EQT060	2-72 - ACL Dyer Exhaust		10 MM BTU/hr		8760 hr/yr (All Year)	
EQT061	5-72 - Hydrolyzer 206		780 ft^3/min		8760 hr/yr (All Year)	
EQT062	1-86 - ACL Receiver		4000 ft^3/min		8760 hr/yr (All Year)	
EQT063	2-86 - Vent Dust Collector		5000 ft^3/min		8760 hr/yr (All Year)	
EQT064	4-87 - Dechlorinator/Neutralizer		250 ft^3/min		8760 hr/yr (All Year)	
EQT065	9-88 - ACL Vacuum Scrubber		333 ft^3/min		1500 hr/yr (All Year)	
EQT066	11-90 - ACL Conditioner		9100 ft^3/min		8760 hr/yr (All Year)	
EQT067	2-94 - ACL Pack. & Rework Dust Collector		5500 ft^3/min		8760 hr/yr (All Year)	
EQT068	1-95 - ACL Hydrolyzer 211		780 ft^3/min		8760 hr/yr (All Year)	
EQT069	2-95 - ACL Hydrolyzer 212		780 ft^3/min		8760 hr/yr (All Year)	
EQT070	4-96 - Sulfuric Acid Tank 210	16000 gallons			8760 hr/yr (All Year)	
EQT071	5-96 - HCL Storage Tank Scrubber Vent	6000 gallons			8760 hr/yr (All Year)	
EQT072	26-97 - Hydrator 213		10 ft^3/min		8760 hr/yr (All Year)	
EQT073	27-97 - Pure Slurry Tank 225	27200 gallons			8760 hr/yr (All Year)	
EQT074	28-97 - Dissolver Tank 224	15500 gallons			8760 hr/yr (All Year)	
EQT075	29-97 - Feed Surge Tank 236	18000 gallons			8760 hr/yr (All Year)	
EQT076	30-97 - Chlorinated Feed Tank 240	29600 gallons			8760 hr/yr (All Year)	
EQT077	31-97 - ACL Cooling Tower 101		200000 ft^3/min		8760 hr/yr (All Year)	
EQT078	32-97 - ACL Jet Cooling Tower 253		126400 ft^3/min		8760 hr/yr (All Year)	
EQT079	33-97 - ACL Cooling Tower 930		150000 ft^3/min		8760 hr/yr (All Year)	
EQT081	114 - No. 1 Kiln				(None Specified)	
EQT082	109 - No. 1 Ammonia Scrubber	250 gallons			(None Specified)	
EQT083	103 - No. 1 Kiln Off-gas Scrubber/Concentrator	600 gallons			(None Specified)	
EQT084	101 - No. 1 Urea Storage Tank	40000 gallons			(None Specified)	
EQT085	132 - No. 1 Mist Eliminator	400 gallons			(None Specified)	
EQT086	705 - No. 2 Kiln Off-gas Scrubber/Concentrator	600 gallons			(None Specified)	
EQT087	716 - No. 2 Ammonia Scrubber				(None Specified)	

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20020007
 Permit Number: 2533-V3
 Air - Title V Regular Permit Minor Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
EQT088	714 - No. 2 Kiln				Urea, cyanuric acid	(None Specified)
EQT089	718 - No. 2 Mist Eliminator	350 gallons			Ammonia, water	(None Specified)
EQT090	124 - Urea Melt Tank	18000 gallons			Urea, water	(None Specified)
EQT091	252 - Centrifuge	200 gallons			NaCl, sodium hypochlorite, ACL	(None Specified)
EQT092	281 - Centrifuge	200 gallons			NaCl, sodium hypochlorite, ACL	56
EQT093	211 - Hydrolyzer	5000 gallons			NaCl, sodium hypochlorite, ACL	56
EQT094	215 - Pure CYA Filter	800 gallons			Sulfuric acid, water, crude CYA	(None Specified)
EQT095	242 - Chlorinator	3000 gallons			Pure CYA, water	(None Specified)
EQT096	245 - Reactor	3000 gallons			Water, NaCl, ACL intermediate, sodium hypochlorite	(None Specified)
EQT097	248 - Flash Tank	6000 gallons			NaCl, sodium hypochlorite, ACL	56
EQT098	250 - Steam Jet	500 gallons			Urea, water	(None Specified)
EQT099	251 - Thickener	2000 gallons			Water, NaCl, sodium hypochlorite, ACL	56
EQT100	257 - Chlorinator Scrubber	1000 gallons			Water, NaCl, sodium hypochlorite, ACL	56
EQT101	259 - Product Filter	500 gallons			Disodium CYA, water	(None Specified)
EQT102	260 - Reslurry Retention Tank	1000 gallons			Water, NaCl, ACL intermediate, sodium hypochlorite	56
EQT103	261 - Product Filtrate Receiver	200 gallons			Urea, water	(None Specified)
EQT104	262 - Mother Liquid Hold Tank	700 gallons			Water, NaCl, ACL intermediate, sodium hypochlorite	56
EQT105	264 - Product Hot Well	7000 gallons			Water, NaCl, ACL intermediate, sodium hypochlorite	56
EQT106	267 - Acidifier	1200 gallons			Water, NaOH	(None Specified)
EQT107	274 - Filtrate Seal Tank	300 gallons			Water, NaCl, ACL intermediate, sodium hypochlorite	(None Specified)
EQT108	322 - Rotex	600 gallons			Water, NaCl, ACL intermediate, sodium hypochlorite	56
EQT109	343 - Compaction Conveyor				ACL 56, ACL 60	(None Specified)
EQT110	344 - Weigh Hopper				ACL 56, ACL 60	(None Specified)
EQT111	367 - Elevator				ACL 56, ACL 60	(None Specified)
EQT112	525 - Surge Tank (RCRA Waste Tank)	50000 gallons			Water, NaCl, ACL intermediate, sodium hypochlorite, NaOH	(None Specified)
EQT113	551 - Dechlorinator	3000 gallons			Water, CYA and CYA salts, ammonia sulfate, NaCl, sodium bicarbonate	(None Specified)
EQT114	552 - Neutralizer	6000 gallons			Water, CYA and CYA salts, ammonia sulfate, NaCl, sodium bicarbonate	(None Specified)

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INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20020007
 Permit Number: 2533-V3
 Air - Title V Regular Permit Minor Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
EQT115	571 - Reward Dissolver	10000 gallons			ACL 56, ACL 60, water	(None Specified)
FUG002	39-96 - Fugitive Emissions from CYA Plant					8760 hr/yr (All Year)
FUG003	40-96 - Fugitive Emissions from AC Plant					8760 hr/yr (All Year)
RLP002	7-82 - CYA Thermal Oxidizer No. 1 Vent	20 MM BTU/hr				8760 hr/yr (All Year)
RLP003	1-96 - #1 Kiln Discharge Hood Duct Vent	3300 ft^3/min				8760 hr/yr (All Year)
RLP004	2-96 - #1 Kiln Process Duct Duct Vent	1350 ft^3/min				8760 hr/yr (All Year)
RLP005	32-96 - CYA Thermal Oxidizer No. 2 Vent	20 MM BTU/hr				8760 hr/yr (All Year)
RLP006	4-97 - #2 Kiln Discharge Hood Duct Duct Vent	3300 ft^3/min				8760 hr/yr (All Year)
RLP007	5-97 - #2 Kiln Process Duct Duct Vent	1350 ft^3/min				8760 hr/yr (All Year)

Subject Item Groups:

ID	Description	Included Components (from Above)
GRP019	Entire Facility	EQT81 114 - No. 1 Kiln
GRP019	Entire Facility	EQT82 109 - No. 1 Ammonia Scrubber
GRP019	Entire Facility	EQT83 103 - No. 1 Kiln Off-gas Scrubber/Concentrator
GRP019	Entire Facility	EQT84 101 - No. 1 Urea Storage Tank
GRP019	Entire Facility	EQT85 132 - No. 1 Mist Eliminator
GRP019	Entire Facility	EQT86 705 - No. 2 Kiln Off-gas Scrubber/Concentrator
GRP019	Entire Facility	EQT87 716 - No. 2 Ammonia Scrubber
GRP019	Entire Facility	EQT88 714 - No. 2 Kiln
GRP019	Entire Facility	EQT89 718 - No. 2 Mist Eliminator
GRP019	Entire Facility	EQT90 124 - Urea Melt Tank
GRP019	Entire Facility	EQT91 252 - Centrifuge
GRP019	Entire Facility	EQT92 281 - Centrifuge
GRP019	Entire Facility	EQT93 211 - Hydrolyzer
GRP019	Entire Facility	EQT94 215 - Pure CYA Filter
GRP019	Entire Facility	EQT95 242 - Chlorinator
GRP019	Entire Facility	EQT96 245 - Reactor
GRP019	Entire Facility	EQT97 248 - Flash Tank
GRP019	Entire Facility	EQT98 250 - Steam Jet
GRP019	Entire Facility	EQT99 251 - Thickener
GRP019	Entire Facility	EQT100 257 - Chlorinator Scrubber
GRP019	Entire Facility	EQT101 259 - Product Filter
GRP019	Entire Facility	EQT102 260 - Rusty Retention Tank
GRP019	Entire Facility	EQT103 261 - Product Filtrate Receiver
GRP019	Entire Facility	EQT104 262 - Mother Liquid Hold Tank

INVENTORIES

AID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20020007
 Permit Number: 2533-V3
 Air - Title V Regular Permit Minor Mod

Subject Item Groups:

ID	Description	Included Components (from Above)
GRP019	Entire Facility	EQT105 264 - Product Hot Well
GRP019	Entire Facility	EQT106 267 - Acidifier
GRP019	Entire Facility	EQT107 274 - Filtrate Seal Tank
GRP019	Entire Facility	EQT108 322 - Rolex
GRP019	Entire Facility	EQT109 343 - Compaction Conveyor
GRP019	Entire Facility	EQT110 344 - Weigh Hopper
GRP019	Entire Facility	EQT111 387 - Elevator
GRP019	Entire Facility	EQT112 525 - Surge Tank (RCRA Waste Tank)
GRP019	Entire Facility	EQT113 551 - Dechlorinator
GRP019	Entire Facility	EQT114 552 - Neutralizer
GRP019	Entire Facility	EQT115 571 - Rework Dissolver
GRP019	Entire Facility	GRP20 CYA Unit
GRP019	Entire Facility	GRP21 ACL Unit
GRP020	CYA Unit	EQT50 15-72 - #1 CYA Kiln
GRP020	CYA Unit	EQT51 2-97 - Urea Unloading Tank Scrubber
GRP020	CYA Unit	EQT52 3-97 - #2 CYA Kiln
GRP020	CYA Unit	EQT53 7-97 - CYA Loading Dust Suppression System
GRP020	CYA Unit	EQT54 9-97 - Hydrizer 743
GRP020	CYA Unit	EQT55 10-97 - Hydrizer 744
GRP020	CYA Unit	EQT56 20-97 - Urea Storage Tank Scrubber
GRP020	CYA Unit	EQT57 34-97 - Hydrator 747
GRP020	CYA Unit	EQT58 35-97 - Pure CYA Storage Tank 770
GRP020	CYA Unit	FUG2 39-96 - Fugitive Emissions from CYA Plant
GRP020	CYA Unit	RLP2 7-82 - CYA Thermal Oxidizer No. 1 Vent
GRP020	CYA Unit	RLP3 1-96 - #1 Kiln Discharge Hood Jacket Vent
GRP020	CYA Unit	RLP4 2-96 - #1 Kiln Process Duct Jacket Vent
GRP020	CYA Unit	RLP5 32-96 - CYA Thermal Oxidizer No. 2 Vent
GRP020	CYA Unit	RLP6 4-97 - #2 Kiln Discharge Hood Jacket Vent
GRP020	CYA Unit	RLP7 5-97 - #2 Kiln Process Duct Jacket Vent
GRP021	ACL Unit	EQT59 1-72 - ACL Chlorine Scrubber
GRP021	ACL Unit	EQT60 2-72 - ACL Dryer Exhaust
GRP021	ACL Unit	EQT61 5-72 - Hydrolizer 206
GRP021	ACL Unit	EQT62 1-86 - ACL Receiver
GRP021	ACL Unit	EQT63 2-86 - Vent Dust Collector
GRP021	ACL Unit	EQT64 4-87 - Dechlorinator/Neutralizer
GRP021	ACL Unit	EQT65 9-88 - ACL Vacuum Scrubber
GRP021	ACL Unit	EQT66 11-90 - ACL Conditioner

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20020007
 Permit Number: 2533-V3
 Air - Title V Regular Permit Minor Mod

Subject Item Groups:

ID	Description	Included Components (from Above)
GRP021	ACL Unit	EQT67 2-94 - ACL Pack & Rework Dust Collector
GRP021	ACL Unit	EQT68 1-95 - ACL Hydrolyzer 2/11
GRP021	ACL Unit	EQT69 2-95 - ACL Hydrolyzer 2/12
GRP021	ACL Unit	EQT70 4-96 - Sulfuric Acid Tank 2/10
GRP021	ACL Unit	EQT71 5-96 - HCl Storage Tank Scrubber Vent
GRP021	ACL Unit	EQT72 26-97 - Hydrator 2/13
GRP021	ACL Unit	EQT73 27-97 - Pure Slurry Tank 2/25
GRP021	ACL Unit	EQT74 28-97 - Dissolver Tank 2/24
GRP021	ACL Unit	EQT75 29-97 - Feed Surge Tank 2/36
GRP021	ACL Unit	EQT76 30-97 - Chlorinated Feed Tank 2/40
GRP021	ACL Unit	EQT77 31-97 - ACL Cooling Tower 1/01
GRP021	ACL Unit	EQT78 32-97 - ACL Jet Cooling Tower 2/33
GRP021	ACL Unit	EQT79 33-97 - ACL Cooling Tower 3/30
GRP021	ACL Unit	FUG3 40-96 - Fugitive Emissions from ACL Plant

Relationships:

Subject Item	Relationship	Subject Item
EQT81 114 - No. 1 Kiln	Vents to	RIP2 7-82 - CYA Thermal Oxidizer No. 1 Vent
EQT82 109 - No. 1 Ammonia Scrubber	Vents to	RIP2 7-82 - CYA Thermal Oxidizer No. 1 Vent
EQT83 103 - No. 1 Kiln Off-gas Scrubber/Concentrator	Vents to	RIP2 7-82 - CYA Thermal Oxidizer No. 1 Vent
EQT84 101 - No. 1 Urea Storage Tank	Vents to	RIP2 7-82 - CYA Thermal Oxidizer No. 1 Vent
EQT84 101 - No. 1 Urea Storage Tank	Vents to	EQT51 2-97 - Urea Unloading Tank Scrubber
EQT84 101 - No. 1 Urea Storage Tank	Vents to	EQT56 20-97 - Urea Storage Tank Scrubber
EQT85 132 - No. 1 Mist Eliminator	Vents to	RIP2 7-82 - CYA Thermal Oxidizer No. 1 Vent
EQT86 705 - No. 2 Kiln Off-gas Scrubber/Concentrator	Vents to	RIP5 32-96 - CYA Thermal Oxidizer No. 2 Vent
EQT87 716 - No. 2 Ammonia Scrubber	Vents to	RIP5 32-96 - CYA Thermal Oxidizer No. 2 Vent
EQT88 714 - No. 2 Kiln	Vents to	RIP5 32-96 - CYA Thermal Oxidizer No. 2 Vent
EQT89 718 - No. 2 Mist Eliminator	Vents to	RIP2 7-82 - CYA Thermal Oxidizer No. 1 Vent
EQT90 124 Urea Melt Tank	Vents to	EQT51 2-97 - Urea Unloading Tank Scrubber
EQT91 252 - Centrifuge	Vents to	EQT59 1-72 - ACL Chlorine Scrubber
EQT92 281 - Centrifuge	Vents to	EQT59 1-72 - ACL Chlorine Scrubber
EQT93 211 - Hydrolyzer	Vents to	EQT59 1-72 - ACL Chlorine Scrubber
EQT94 215 Pure CYA Filter	Vents to	EQT59 1-72 - ACL Chlorine Scrubber
EQT95 242 - Chlorinator	Vents to	EQT59 1-72 - ACL Chlorine Scrubber
EQT96 245 - Reactor	Vents to	EQT59 1-72 - ACL Chlorine Scrubber
EQT97 248 - Flash Tank	Vents to	EQT59 1-72 - ACL Chlorine Scrubber
EQT98 250 - Steam Jet	Vents to	EQT59 1-72 - ACL Chlorine Scrubber

INVENTORIES

AID: 1096 - Monsanto Co - Lulling Plant
 Activity Number: PER20020007
 Permit Number: 2533-V3
 Air - Title V Regular Permit Minor Mod

Relationships:

Subject Item	Relationship	Subject Item
EQT98 251 - Thickener	Vents to	EQT59 1-72 - ACL Chlorine Scrubber
EQT100 257 - Chlorinator Scrubber	Vents to	EQT59 1-72 - ACL Chlorine Scrubber
EQT101 259 - Product Filter	Vents to	EQT59 1-72 - ACL Chlorine Scrubber
EQT102 260 - Resurry Retention Tank	Vents to	EQT59 1-72 - ACL Chlorine Scrubber
EQT103 261 - Product Filtrate Receiver	Vents to	EQT59 1-72 - ACL Chlorine Scrubber
EQT104 262 - Mother Liquid Hold Tank	Vents to	EQT59 1-72 - ACL Chlorine Scrubber
EQT105 264 - Product Hot Well	Vents to	EQT59 1-72 - ACL Chlorine Scrubber
EQT106 267 - Acidifier	Vents to	EQT59 1-72 - ACL Chlorine Scrubber
EQT107 274 - Filtrate Seal Tank	Vents to	EQT59 1-72 - ACL Chlorine Scrubber
EQT108 322 - Rotex	Vents to	EQT63 2-86 - Vent/Dust Collector
EQT109 343 - Compaction Conveyor	Vents to	EQT63 2-86 - Vent/Dust Collector
EQT110 344 - Weigh Hopper	Vents to	EQT63 2-86 - Vent/Dust Collector
EQT111 367 - Elevator	Vents to	EQT63 2-86 - Vent/Dust Collector
EQT112 525 - Surge Tank (RCRA Waste Tank)	Vents to	EQT59 1-72 - ACL Chlorine Scrubber
EQT113 551 - Dechlorinator	Vents to	EQT64 4-87 - Dechlorinator/Neutralizer
EQT114 552 - Neutralizer	Vents to	EQT64 4-87 - Dechlorinator/Neutralizer
EQT115 571 - Rework Dissolver	Vents to	EQT59 1-72 - ACL Chlorine Scrubber

Stack Information:

ID	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
EQT050 15-72 - #1 CYA Kiln	23.7	23950	4.63		113	750
EQT051 2-97 - Urea Unloading Tank Scrubber	70	6000	1.33		65	85
EQT052 3-97 - #2 CYA Kiln	23.7	23950	4.63		113	750
EQT053 7-97 - CYA Loading Dust Suppression System	26	300	.5		30	80
EQT054 9-97 - Hydrolyzer 743	16	1000	1.5		61	150
EQT055 10-97 - Hydrolyzer 744	16	1000	1.17		61	150
EQT056 20-97 - Urea Storage Tank Scrubber	40	200	.33		60	100
EQT057 34-97 - Hydrolator 747	1.7	20	.5		20	90
EQT058 35-97 - Pure CYA Storage Tank 770	1.27	15	.5		25	90
EQT059 1-72 - ACL Chlorine Scrubber	67	5600	1.33		106	132
EQT060 2-72 - ACL Dryer Exhaust	110	20600	2		106	173
EQT061 5-72 - Hydrolyzer 206	12	780	1.17		71	160
EQT062 1-86 - ACL Receiver	85	4000	1		110	200
EQT063 2-86 - Vent/Dust Collector	60	5000	1.33		110	80
EQT064 4-87 - Dechlorinator/Neutralizer	85	250	.25		60	88
EQT065 9-88 - ACL Vacuum Scrubber	62	333	.33		40	230
EQT066 11-90 - ACL Conditioner	109	9100	1.33		106	120
EQT067 2-94 - ACL Pack & Rework Dust Collector	35	5500	1.83		110	80
EQT068 1-95 - ACL Hydrolyzer 211	12	780	1.17		71	160

INVENTORIES

AID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20020007
 Permit Number: 2533-V3
 Air - Title V Regular Permit Minor Mod

Stack Information:

ID	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
EQT069 2-95 - ACL Hydrolyzer 212	12	780	1.17	.33	71	160
EQT070 4-96 - Sulfuric Acid Tank 210	7	33	.56	.67	30	80
EQT071 5-96 - HCl Storage Tank Scrubber Vent	.27	10	1	1	20	77
EQT072 26-97 -Hydrolyzer 213						
EQT073 27-97 -Pure Slurry Tank 225						
EQT074 28-97 - Dissolver Tank 224	1.2	20	1	1	35	90
EQT075 29-97 - Feed Surge Tank 236	2.2	56	1	1	45	105
EQT076 30-97 - Chlorinated Feed Tank 241		100	1	1	30	90
EQT077 31-97 -ACL Cooling Tower 101		26	1	1	35	90
EQT078 32-97 -ACL Jet Cooling Tower 263	21	200000	156	156	7	
EQT079 33-97 -ACL Cooling Tower 930	11	126400	188	188	12	
EQT081 114 - No. 1 Kiln	13	150000	188	188	12	
EQT082 109 - No. 1 Ammonia Scrubber						
EQT083 103 - No. 1 Kiln Off-gas Scrubber Concentrator						
EQT084 101 - No. 1 Urea Storage Tank						
EQT085 132 - No. 1 Mist Eliminator						
EQT086 705 - No. 2 Kiln Off-gas Scrubber/Concentrator						
EQT087 716 - No. 2 Ammonia Scrubber						
EQT088 714 - No. 2 Kiln						
EQT089 718 - No. 2 Mist Eliminator						
EQT090 124 - Urea Melt Tank						
EQT091 252 - Centrifuge						
EQT092 281 - Centrifuge						
EQT093 211 - Hydrolyzer						
EQT094 215 - Pure CTA Filter						
EQT095 242 - Chlorinator						
EQT097 248 - Flash Tank						
EQT098 250 - Steam Jet						
EQT099 251 - Thickener						
EQT100 257 - Chlorinator Scrubber						
EQT101 259 - Product Filter						
EQT102 260 - Resurry Retention Tank						
EQT103 261 - Product Filtrate Receiver						
EQT104 262 - Mother Liquid Hold Tank						
EQT105 264 - Product Hot Well						
EQT106 267 - Acidifier						
EQT107 274 - Filtrate Seal Tank						
EQT108 322 - Rotex						
EQT109 343 - Compaction Conveyor						
EQT110 344 - Weigh Hopper						
EQT111 367 - Elevator						
EQT112 525 - Surge Tank (RCRA Waste Tank)						

INVENTORIES

AID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20020007
 Permit Number: 2533-V3
 Air - Title V Regular Permit Minor Mod

Stack Information:

ID		Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
EQT113	551 - Dechlorinator						
EQT114	552 - Neutralizer						
EQT115	571 - Rework Dissolver						
RLP002	7-82 - CYA Thermal Oxidizer No. 1 Vent	98	20500	2.5	.77	400	
RLP003	1-96 - #1 Klin Process Duct Jackel Vent	160	3300	.67			
RLP004	2-96 - #1 Klin Process Duct Jackel Vent	265	1350	.33			
RLP005	32-96 - CYA Thermal Oxidizer No. 2 Vent	98	20500	2.5	.77	400	
RLP006	4-97 - #2 Klin Discharge Hood Jackel Vent	160	3300	.67			
RLP007	5-97 - #2 Klin Process Duct Jackel Vent	265	1350	.33			

Fee Information:

Sub Item Id	Multiplier	Units Of Measure	Fee Desc
GRP019	60	MM Lb/Yr	0620 - Halogenated Hydrocarbons (Rated Capacity)
	140	MM Lb/Yr	0690 - Chemical and Chemical Prep. N.E.C. (Rated Capacity)

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20020007
 Permit Number: 2533-V3
 Air - Title V Regular Permit Minor Mod

All phases

Subject Item	PM ₁₀		SO ₂		NOx		CO		VOC	
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr
EQT 050 15-72	0.07	0.10	0.33	0.01	0.01	0.04	2.05	2.81	9.02	0.59
EQT 052 3-97	0.07	0.10	0.33	0.01	0.01	0.04	2.05	2.81	9.02	0.59
EQT 053 7-97	0.17	0.34	0.17							
EQT 054 9-97	0.26	0.35	1.14							
EQT 055 10-97	0.07	0.08	0.30							
EQT 057 34-97									< 0.001	< 0.001
EQT 058 35-97									< 0.001	< 0.001
EQT 060 2-72	0.82	1.23	3.68	< 0.01	0.02	0.02	0.80	0.96	3.50	1.50
EQT 061 5-72	0.26	0.35	1.14							
EQT 062 1-86	0.17	0.34	0.75							
EQT 063 2-86	0.60	0.72	2.63							
EQT 065 9-88	10.79	11.25	1.97							
EQT 066 11-80	0.30	0.45	1.32							
EQT 067 2-94	0.12	0.60	0.52							
EQT 068 1-95	0.07	0.08	0.30							
EQT 069 2-95	0.07	0.08	0.30							
EQT 072 26-97									< 0.001	< 0.001
EQT 073 21-97									< 0.001	< 0.001

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20020007
 Permit Number: 2533-V3

Air - Title V Regular Permit Minor Mod

All phases

Subject Item	PM ₁₀			SO ₂			NOx			CO			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
EQT 074 28-97													< 0.001	< 0.001	< 0.001
EQT 075 29-97													< 0.001	< 0.001	< 0.001
EQT 076 30-97													< 0.001	< 0.001	< 0.001
EQT 077 31-97													< 0.001	< 0.001	< 0.001
EQT 078 32-97													< 0.001	< 0.001	< 0.001
EQT 079 33-97													< 0.001	< 0.001	< 0.001
GRP 020	4.17						1.17			81.56			36.84		1.52
GRP 021		12.61					0.02			3.50			6.57		0.18
RLP 002 7-82	0.20	0.40	0.88	0.12	0.24	0.53	8.00	25.00	30.00	3.50	10.00	15.33	0.12	0.24	0.53
RLP 003 1-86	0.01	0.03	0.05	0.002	0.003	0.01	0.28	0.39	1.24	0.08	0.11	0.36	0.003	0.01	0.03
RLP 004 2-96	0.005	0.01	0.02	0.001	0.002	0.004	0.14	0.20	0.52	0.04	0.06	0.15	0.002	0.01	0.01
RLP 005 32-86	0.20	0.40	0.88	0.12	0.24	0.53	8.00	25.00	30.00	3.50	10.00	15.33	0.12	0.24	0.53
RLP 006 4-97	0.01	0.03	0.05	0.002	0.003	0.01	0.28	0.39	1.24	0.08	0.11	0.36	0.003	0.01	0.03
RLP 007 5-97	0.005	0.01	0.02	0.001	0.002	0.004	0.14	0.20	0.52	0.04	0.06	0.15	0.002	0.01	0.01

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals

Permit Phase Totals:

PM10: 12.61 tons/yr
 PM10: 4.17 tons/yr
 SO2: 0.02 tons/yr
 SO2: 1.17 tons/yr

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1096 - Monsanto Co - Luling Plant
Activity Number: PER20020007
Permit Number: 2533-V3
Air - Title V Regular Permit Minor Mod

All phases

NOx: 3.50 tons/yr
NOx: 81.56 tons/yr

CO: 36.84 tons/yr
CO: 6.57 tons/yr

VOC: 0.18 tons/yr
VOC: 1.52 tons/yr

Emission rates Notes:

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AJ ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20020007
 Permit Number: 2533-V3
 Air - Title V Regular Permit Minor Mod

All phases

Subject Item	Ammonia			Chlorine			Hydrochloric acid			Sulfuric acid		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
EQT 051 2-97	0.54	1.47	2.37									
EQT 056 20-97	0.25	0.50	1.10									
EQT 059 1-72				1.67	4.70	7.31						
EQT 064 4-87				0.45	0.90	1.97						
EQT 065 9-88				1.20	1.50	0.22						
EQT 070 4-96										< 0.001	< 0.001	
EQT 071 5-96										< 0.1	0.23	0.01
FUG 003 40-96				0.01	0.02	0.06						
GRP 020			71.79									
GRP 021							9.56			0.01		< 0.001
RLP 002 7-82	7.80	16.00	34.16									
RLP 005 32-96	7.80	16.00	34.16									

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals

Permit Parameter Totals:

Ammonia: 71.79 tons/yr
 Chlorine: 9.56 tons/yr
 Hydrochloric acid: 0.01 tons/yr
 Sulfuric acid: <0.001 tons/yr

Emission Rates Notes:

SPECIFIC REQUIREMENTS

AI ID: 1096 - Monsanto Co - Luling Plant

Activity Number: PER20020007

Permit Number: 2533-V3

Air - Title V Regular Permit Minor Mod

EQT050 15-72 - #1 CYA Kiln

- 1 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.B]
- Which Months: All Year Statistical Basis: None specified
- 2 The CYA Kiln No. 1, Emission Point 15-72, shall be maintained and operated with no visible emissions. Vents shall be inspected for visual emissions on a daily basis. If visible emissions are detected, then, within three (3) working days the permittee shall conduct a six minute opacity reading in accordance with EPA Reference Method 9. Records of opacity checks shall include the emission point ID, the date the visual check was performed, a record if visible emissions were detected, and a record and results of any Method 9 testing conducted. These records shall be kept on site and available for inspection by the office of Environmental Compliance, Surveillance Division. [LAC 33:III.1103.B]
- 3 Emissions of smoke which pass onto or across a public road shall not create a traffic hazard by impairment of visibility or intensify an existing traffic hazard. [LAC 33:III.1103]
- 4 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]
- Which Months: All Year Statistical Basis: Six-minute average
- 5 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]
- 6 Comply with the requirements of PSD-LA-623 for PM10 and CO emissions. BACT for PM10 emissions is the use of natural gas as fuel. BACT for CO emissions is good design, operation, and combustion practices. [Kiln burners are fired with natural gas. [LAC 33:III.509]

EQT051 2-97 - Urea Unloading Tank Scrubber

- 7 Comprehensive Toxic Air Pollutant Emission Control Program. LAC 33:III.5109. Emits Class III TAP only. MACT is not required. This scrubber has an efficiency is 99% and it is used when kiln is out of service. [LAC 33:III.5109.A]
- 8 The Urea Storage Tank 101 may be routed to Urea Unloading Tank Scrubber, Emission Point 2-97, when operational or maintenance needs arise with the Urea Storage Tank Scrubber. [LAC 33:III.5109.B]
- 9 Under normal operating conditions, CYA Kiln No. 1 and Urea Storage Tank 101 shall vent to CYA Thermal Oxidizer No. 1, Emission Point 7-82, for 99.2% control. [LAC 33:III.5109.B]
- 10 The Urea Unloading Tank Scrubber, Emission Point 2-97, shall be operated to reduce ammonia emissions from the Urea Melt Tank 124 by 95%. Scrubber media flow shall be maintained at > 400 gpm and pH less than 6.5. Compliance shall be determined on an hourly average basis. Records of scrubber media flow and pH shall be maintained on site and available for inspection by the Office of Environmental Compliance Surveillance Division. [LAC 33:III.5109.B]

EQT052 3-97 - #2 CYA Kiln

- 11 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.B]
- Which Months: All Year Statistical Basis: None specified
- 12 The CYA Kiln No. 2, Emission Point 3-97, shall be maintained and operated with no visible emissions. Vents shall be inspected for visual emissions on a daily basis. If visible emissions are detected, then, within three (3) working days the permittee shall conduct a six minute opacity reading in accordance with EPA Reference Method 9. Records of opacity checks shall include the emission point ID, the date the visual check was performed, a record if visible emissions were detected, and a record and results of any Method 9 testing conducted. These records shall be kept on site and available for inspection by the office of Environmental Compliance, Surveillance Division. [LAC 33:III.1103.B]

SPECIFIC REQUIREMENTS

AI ID: 1096 - Monsanto Co - Luling Plant
Activity Number: PER20020007
Permit Number: 2533-V3

Air - Title V Regular Permit Minor Mod

EQT052 3-97 - #2 CYA Kiln

- 13 Emissions of smoke which pass onto or across a public road shall not create a traffic hazard by impairment of visibility or intensify an existing traffic hazard. [LAC 33:III.1103]
- 14 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]
Which Months: All Year Statistical Basis: Six-minute average
- 15 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]
- 16 Comply with the requirements of PSD-LA-623 for PM10 and CO emissions. BACT for PM10 emissions is the use of natural gas as fuel. BACT for CO emissions is good design, operation, and combustion practices. This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-623. [LAC 33:III.509]

EQT053 7-97 - CYA Loading Dust Suppression System

- 17 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7. [LAC 33:III.1305]
- 18 The CYA Loading Dust Suppression System, Emission Point 7-97, shall be maintained and operated with no visible emissions. Vents shall be inspected for visual emissions on a daily basis. If visible emissions are detected, then, within three (3) working days the permittee shall conduct a six minute opacity reading in accordance with EPA Reference Method 9. Records of opacity checks shall include the emission point ID, the date the visual check was performed, a record if visible emissions were detected, and a record and results of any Method 9 testing conducted. These records shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.1305]
- 19 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]
Which Months: All Year Statistical Basis: Six-minute average
- 20 Records of daily, monthly, and yearly hours of operation of the CYA Loading Dust Suppression System, Emission Point 7-97, shall be maintained on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.1311.C]

EQT054 9-97 - Hydrolyzer 743

- 21 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7. [LAC 33:III.1305]
- 22 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]
Which Months: All Year Statistical Basis: Six-minute average
- 23 Permittee shall continuously monitor the scrubbing solution flow to the spray nozzles inside Hydrolyzer 743, Emission Point 9-97, during solid filling. Flow rate shall be maintained at 3 gpm minimum. Records of the flow rate shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]

EQT055 10-97 - Hydrolyzer 744

- 24 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7. [LAC 33:III.1305]

SPECIFIC REQUIREMENTS

AI ID: 1096 - Monsanto Co - Luling Plant
Activity Number: PER20020007
Permit Number: 2533-V3
Air - Title V Regular Permit Minor Mod

EQT055 10-97 - Hydrolyzer 744

25 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]
Which Months: All Year Statistical Basis: Six-minute average

EQT056 20-97 - Urea Storage Tank Scrubber

26 Comprehensive Toxic Air Pollutant Emission Control Program. LAC 33:III.5109. Emits Class III TAP only. MACT is not required. This scrubber has an efficiency is 95% and it is used when kiln is out of service. [LAC 33:III.5109.A]
27 The Urea Storage Tank Scrubber, Emission Point 20-97, shall be operated to control emissions from the Urea Storage Tank 101, when the CYA Thermal Oxidizer No. 1 is not receiving waste gas. Ammonia emissions shall be reduced 99% by maintaining the scrubber media flow at 5 gpm or more. Compliance shall be determined on an hourly average basis. Records of scrubber flow shall be maintained on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. The Urea Storage Tank 101 may be routed to Urea Unloading Tank Scrubber, Emission Point 2-97, when operational or maintenance needs arise with the Urea Storage Tank Scrubber. [LAC 33:III.5109.B]

EQT059 1-72 - ACL Chlorine Scrubber

28 Comprehensive Toxic Air Pollutant Emission Control Program. LAC 33:III.5109. Emits Class III TAP only (chlorine). MACT is not required. [LAC 33:III.5109]
29 Emission Limits, Emissions Testing, Notification, Recordkeeping, and Reporting Requirements apply. Compliance date is May 10, 2008. [40 CFR 63.FFFF]
30 The ACL Chlorine Scrubber, Emission Point 1-72, shall be operated to maintain a minimum water flow of 30 gpm and at least 92% chlorine removal efficiency at the wet end. The chlorine concentration exiting the scrubber shall be monitored continuously and the caustic feed adjusted to maintain the chlorine concentration below 71 ppm. Compliance for each parameter shall be determined on an hourly average basis. Records of operating conditions shall be maintained on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [40 CFR 64.2(3)(b)(1)(vii)]
31 Chlorine emissions from the ACL Chlorine Scrubber, Emission Point 1-72 shall be calculated and recorded daily. Document chlorine emissions for each month, as well as for the previous twelve consecutive months. Emission in excess of the limits specified for any 12 month consecutive period shall be a violation of this permit and must be reported to the Office of Environmental Compliance, Enforcement Division. Records of water flow, chlorine concentration, caustic feed rates, and chlorine emissions shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. Records of operating conditions shall be maintained on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [40 CFR 64.2(3)(b)(1)(vi)]

EQT060 2-72 - ACL Dryer Exhaust

32 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.B]
Which Months: All Year Statistical Basis: None specified
33 Emissions of smoke which pass onto or across a public road shall not create a traffic hazard by impairment of visibility or intensify an existing traffic hazard. [LAC 33:III.1103]
34 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]
Which Months: All Year Statistical Basis: Six-minute average

SPECIFIC REQUIREMENTS

AI ID: 1096 - Monsanto Co - Luling Plant

Activity Number: PER20020007

Permit Number: 2533-V3

Air - Title V Regular Permit Minor Mod

EQT060 2.72 - ACL Dryer Exhaust

35 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]

36 Comply with the requirements of PSD-LA-623 for PM10 emissions. A BACT analysis was not required for this source. [LAC 33:III.509]

37 The ACL Dryer Exhaust, Emission Point 2-72, shall be maintained and operated with no visible emissions. Vents shall be inspected for visual emissions on a daily basis. If visible emissions are detected, then, within three (3) working days the permittee shall conduct a six minute opacity reading in accordance with EPA Reference Method 9. Records of opacity checks shall include the emission point ID, the date the visual check was performed, a record if visible emissions were detected, and a record and results of any Method 9 testing conducted. These records shall be kept on site and available for inspection by the office of Environmental Compliance, Surveillance Division. Inlet stream to control device contains greater than 100 TPY PM10. [40 CFR 64]

EQT061 5.72 - Hydrolyzer 206

38 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1.305.1-7. [LAC 33:III.1305]

39 Opacity <= 20 percent, except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]

Which Months: All Year Statistical Basis: Six-minute average

40 Comply with the requirements of PSD-LA-623 for PM10 emissions. A BACT analysis was not required for this source. [LAC 33:III.509]

41 Permittee shall continuously monitor the scrubbing solution flow to the spray nozzles installed in the vent stack of the Hydrolyzer 206, Emission Point 5-72, during solid filling. Flow rate shall be maintained at 3 gpm minimum. Records of the flow rate shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division [PSD-LA-623]. [LAC 33:III.509]

EQT062 1-86 - ACL Receiver

42 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1.305.1-7. [LAC 33:III.1305]

43 Opacity <= 20 percent, except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]

Which Months: All Year Statistical Basis: Six-minute average

44 Comply with the requirements of PSD-LA-623 for PM10 emissions. A BACT analysis was not required for this source. [LAC 33:III.509]

45 The ACL Receiver, Emission Point 1-86, shall be maintained and operated with no visible emissions. Vents shall be inspected for visual emissions on a daily basis. If visible emissions are detected, then, within three (3) working days the permittee shall conduct a six minute opacity reading in accordance with EPA Reference Method 9. Records of opacity checks shall include the emission point ID, the date the visual check was performed, a record if visible emissions were detected, and a record and results of any Method 9 testing conducted. These records shall be kept on site and available for inspection by the office of Environmental Compliance, Surveillance Division. Inlet stream to control device contains greater than 100 TPY PM10. [40 CFR 64]

46 Inlet stream to control device contains greater than 100 TPY PM10. [40 CFR 64]

EQT063 2-86 - Vent Dust Collector

SPECIFIC REQUIREMENTS

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EQT063 2-86 - Vent Dust Collector

- 47 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7. [LAC 33:III.1305]
- 48 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]
Which Months: All Year Statistical Basis: Six-minute average
- 49 Comply with the requirements of PSD-LA-623 for PM10 emissions. A BACT analysis was not required for this source. [LAC 33:III.509]
- 50 The Vent Dust Collector, Emission Point 2-86, shall be maintained and operated properly. Filter vents shall be inspected for visual emissions on a daily basis. The filter elements (bags) shall be inspected every six months and whenever visual checks indicate maintenance may be necessary. Elements shall be changed as necessary. Records of visual checks and maintenance inspections of the dust collectors shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division [PSD-LA-623]. [LAC 33:III.509]
- 51 The ACL Dryer Exhaust, Emission Point 2-72, shall be maintained and operated with no visible emissions. Vents shall be inspected for visual emissions on a daily basis. If visible emissions are detected, then, within three (3) working days the permittee shall conduct a six minute opacity reading in accordance with EPA Reference Method 9. Records of opacity checks shall include the emission point ID, the date the visual check was performed, a record if visible emissions were detected, and a record and results of any Method 9 testing conducted. These records shall be kept on site and available for inspection by the office of Environmental Compliance, Surveillance Division. [PSD-LA-623]. [LAC 33:III.509]

EQT064 4-87 - Dechlorinator/Neutralizer

- 52 Comprehensive Toxic Air Pollutant Emission Control Program. LAC 33:III.5109. Emits Class III TAP only (chlorine). MACT is not required. [LAC 33:III.5109]

EQT065 9-88 - ACL Vacuum Scrubber

- 53 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]
Which Months: All Year Statistical Basis: Six-minute average
- 54 The ACL Vacuum scrubber, Emission Point 9-88, shall have steam and water flow verified when operating to maintain 99% chlorine removal efficiency at the dry end with no visible emissions. Water flow shall be at least 30 gpm. Compliance shall be determined on an hourly average basis. Records of operating conditions shall be maintained on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]
- 55 Records of daily, monthly, and yearly hours of operation of the ACL Vacuum Scrubber, Emission Point 9-88, shall be maintained on site and available for inspection by the office of Environmental Compliance, Surveillance Division. [PSD-LA-623]. [LAC 33:III.509]
- 56 Comprehensive Toxic Air Pollutant Emission Control Program. LAC 33:III.5109. Emits Class III TAP only (chlorine). MACT is not required. [LAC 33:III.5109]

EQT066 11-90 - ACL Conditioner

- 57 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7. [LAC 33:III.1305]
- 58 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]
Which Months: All Year Statistical Basis: Six-minute average
- 59 Comply with the requirements of PSD-LA-623 for PM10 emissions. A BACT analysis was not required for this source. [LAC 33:III.509]

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EQT066 11-90 - ACL Conditioner

- 60 The ACL Conditioner Baghouse, Emission Point 11-90, shall be maintained and operated with no visible emissions. Vents shall be inspected for visual emissions on a daily basis. If visible emissions are detected, then, within three (3) working days the permittee shall conduct a six minute opacity reading in accordance with EPA Reference Method 9. Records of opacity checks shall include the emission point ID, the date the visual check was performed, a record if visible emissions were detected, and a record and results of any Method 9 testing conducted. These records shall be kept on site and available for inspection by the office of Environmental Compliance, Surveillance Division. [LAC 33.III.5109.B]

EQT067 2-94 - ACL Pack & Rework Dust Collector

- 61 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33.III.1305.1-7. [LAC 33.III.1305]
62 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33.III.1311.C]
Which Months: All Year Statistical Basis: Six-minute average
63 Comply with the requirements of PSD-LA-623 for PM10 emissions. A BACT analysis was not required for this source. [LAC 33.III.509]
64 The ACL Packaging & Rework Dust, Emission Point 2-94, shall be maintained and operated properly. Filter vents shall be inspected for visual emissions on a daily basis. The filter elements (bags) shall be inspected every six months and whenever visual checks indicate maintenance may be necessary. Elements shall be changed as necessary. Records of visual checks and maintenance inspections of the dust collectors shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division [PSD-LA-623]. [LAC 33.III.509]
65 The ACL Pack & Rework Dust Collector, Emission Point 2-94, shall be maintained and operated with no visible emissions. Vents shall be inspected for visual emissions on a daily basis. If visible emissions are detected, then, within three (3) working days the permittee shall conduct a six minute opacity reading in accordance with EPA Reference Method 9. Records of opacity checks shall include the emission point ID, the date the visual check was performed, a record if visible emissions were detected, and a record and results of any Method 9 testing conducted. These records shall be kept on site and available for inspection by the office of Environmental Compliance, Surveillance Division [PSD-LA-623]. [LAC 33.III.509]

EQT068 1-95 - ACL Hydrolyzer 211

- 66 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33.III.1305.1-7. [LAC 33.III.1305]
67 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33.III.1311.C]
Which Months: All Year Statistical Basis: Six-minute average
68 Comply with the requirements of PSD-LA-623 for PM10 emissions. A BACT analysis was not required for this source. [LAC 33.III.509]

EQT069 2-95 - ACL Hydrolyzer 212

- 69 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33.III.1305.1-7. [LAC 33.III.1305]
70 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33.III.1311.C]
Which Months: All Year Statistical Basis: Six-minute average

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EQT069 2-95 - ACL Hydrolyzer 212

71 Comply with the requirements of PSD-LA-623 for PM10 emissions. A BACT analysis was not required for this source. [LAC 33:III.509]

EQT070 4-96 - Sulfuric Acid Tank 210

72 Comprehensive Toxic Air Pollutant Emission Control Program. LAC 33:III.5109. Emits Class III TAP only (sulfuric acid). MACT is not required. [LAC 33:III.5109]

EQT071 5-96 - HCL Storage Tank Scrubber Vent

73 The HCl Tank No. 230 Scrubber, Emission Point 3-96, shall have steam and water flow verified when operating to maintain 99% chlorine removal efficiency at the dry end with no visible emissions. Water flow shall be at least 1 gpm. Compliance shall be determined on an hourly average basis. Records of operating conditions shall be maintained on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.5109.A]

74 Comprehensive Toxic Air Pollutant Emission Control Program. LAC 33:III.5109. Emits Class III TAP only (hydrochloric acid). MACT is not required. [LAC 33:III.5109]

FUG002 39-96 - Fugitive Emissions from CYA Plant

75 Repair according to LAC 33:III.2121.B.3 any regulated component observed leaking by sight, sound, or smell, regardless of the leak's concentration. [LAC 33:III.2121.B.1]

76 Do not locate any valve, except safety pressure relief valves, valves on sample lines, valves on drain lines and valves that can be removed and replaced without a shutdown, at the end of a pipe or line containing VOC unless the end of such line is sealed with a second valve, a blind flange, a plug, or a cap. Remove such sealing devices only when the line is in use, for example, when a sample is being taken. When the line has been used and is subsequently resealed, close the upstream valve first, followed by the sealing device. [LAC 33:III.2121.B.2]

77 Make every reasonable effort to repair a leaking component, as described in LAC 33:III.2121.B, within 15 days, except as provided. [LAC 33:III.2121.B.3]

78 When a leak that cannot be repaired on-line and in-place is located, affix to the leaking component a weatherproof and readily visible tag bearing an identification number and the date the leak is located. Date and remove the tag after the leak is repaired. [LAC 33:III.2121.E.1]

79 Equipment/operational data recordkeeping by survey log upon each occurrence of a leak. Include the leaking component information specified in LAC 33:III.2121.E.2. Retain the survey log for two years after the latter date specified in LAC 33:III.2121.E.2 and make said log available to DEQ upon request. [LAC 33:III.2121.E]

80 Urea <= 0.26 lb/hr.

Which Months: All Year Statistical Basis: Hourly Average. [LAC 33:III.501.C.6]

81 Urea <= 1.14 tons/yr.

Which Months: All Year Statistical Basis: Annual Maximum. [LAC 33:III.501.C.6]

82 Equipment/operational data recordkeeping by logbook continuously. Record and keep the specified information in a readily accessible location for use in determining exemptions as provided in 40 CFR 60.480(d). Subpart VV. [40 CFR 60.486(i)]

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83 Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited. [LAC 33:III.1103]

84 Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited. [LAC 33:III.1303.B]

85 Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5. [LAC 33:III.2113.A]

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- 86 Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit,
- 87 Ammonia <= 71.79 tons/yr. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: Annual maximum
- 88 Carbon monoxide <= 36.84 tons/yr. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: Annual maximum
- 89 Nitrogen oxides <= 81.56 tons/yr. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: Annual maximum
- 90 Particulate matter (10 microns or less) <= 4.17 tons/yr. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: Annual maximum
- 91 Sulfur dioxide <= 1.17 tons/yr. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: Annual maximum
- 92 VOC, Total <= 1.52 tons/yr. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: Annual maximum
- 93 Carbon monoxide <= 6.57 tons/yr. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: Annual maximum
- 94 Chlorine <= 9.56 tons/yr. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: Annual maximum
- 95 Hydrochloric acid <= 0.01 tons/yr. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: Annual maximum
- 96 Nitrogen oxides <= 3.50 tons/yr. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: Annual maximum
- 97 Particulate matter (10 microns or less) <= 12.61 tons/yr. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: Annual maximum
- 98 Sulfur dioxide <= 0.02 tons/yr. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: Annual maximum
- 99 Sulfuric acid < 0.001 tons/yr. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: Annual maximum
- 100 VOC, Total <= 0.18 tons/yr. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: Annual maximum
- 101 Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III. Chapter 51. Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III. Chapter 51. Subchapter A, after the effective date of the standard. [LAC 33:III.5105.A.1]
- 102 Do not cause a violation of any ambient air standard listed in LAC 33:III. Table 51.2, unless operating in accordance with LAC 33:III.5109. [LAC 33:III.5105.A.2]
- 103 Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard. [LAC 33:III.5105.A.3]
- 104 Do not fail to keep records, notify, report or revise reports as required under LAC 33:III. Chapter 51. Subchapter A. [LAC 33:III.5105.A.4]
- 105 Submit initial annual emissions report (IEBDI) to DEQ within 180 days of December 20, 1991. Identify the quantity of emissions of toxic air pollutants listed in Table 51.1 for the calendar year 1991. [LAC 33:III.5107.A.1]

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- 106 Submit Annual Emissions Report (TEDI). Due annually, by the 1st of July, to the Office of Environmental Assessment, Air Quality Assessment Division, in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3. [LAC 33:III.5107.A.2]
- 107 Include a certification statement with initial and subsequent annual emission reports and revisions to any emission report to attest that the information contained in the emission report is true, accurate, and complete, and signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official. The certification statement shall read: "I certify, under penalty of perjury, that the emissions data provided is accurate to the best of my knowledge, information, and belief, and I understand that submitting false or misleading information will expose me to prosecution under state regulations" [LAC 33:III.5107.A.3]
- 108 Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but no later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere which results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property). [LAC 33:III.5107.B.1]
- 109 Submit notification: Due to the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC), except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:III.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:III.5107.B.2]
- 110 Submit notification: Due to the Office of Environmental Compliance, Emergency and Radiological Services, SPOC, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:III.3931, except as provided in LAC 33:III.5107.B.6. Submit notification in the manner provided in LAC 33:III.3923. [LAC 33:III.5107.B.3]
- 111 Submit written report: Due within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through 3. Submit report to the Office of Environmental Compliance by certified mail. Include the information specified in LAC 33:III.5107.B.4.i through viii. [LAC 33:III.5107.B.4]
- 112 Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, in the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge. [LAC 33:III.5107.B.5]
- 113 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. [LAC 33:III.5109.A]
- 114 Achieve compliance with ambient air standards unless it can be demonstrated to the satisfaction of DEQ that compliance with an ambient air standard would be economically infeasible; that emissions could not reasonably be expected to pose a threat to public health or the environment; and that emissions would be controlled to a level that is Maximum Achievable Control Technology. [LAC 33:III.5109.B.3]
- 115 Determine the status of compliance, beyond the property line, with applicable ambient air standards listed in LAC 33:III.5112.Table 51.2. [LAC 33:III.5109.B]
- 116 Unless otherwise provided for in an underlying regulation, data acquisition covering 95% of the operating time for any consecutive 12-month period shall be deemed sufficient to meet continuous monitoring and recording provisions in these specific conditions. [LAC 33:III.5109.B]
- 117 Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III.Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by the department. [LAC 33:III.5109.C]
- 118 Obtain a Louisiana Air Permit in accordance with LAC 33:III.5111.B and C and in accordance with LAC 33:III.1701, before commencement of the construction of any new source. [LAC 33:III.5111.A.]

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- 119 Obtain a permit modification in accordance with LAC 33:III.5111.B and C before commencement of any modification not specified in a compliance plan submitted under LAC 33:III.5109.D, if the modification will result in an increase in emissions of any toxic air pollutant or will create a new point source. [LAC 33:III.5111.A.2.a]
- 120 Do not commence construction or modification of any major source without first obtaining written authorization from DEQ, as specified. [LAC 33:III.5111.A.]
- 121 Ensure that all testing done to determine the emission of toxic air pollutants, upon request by the department, is conducted by qualified personnel. [LAC 33:III.5113.B.1]
- 122 Submit test results: Due in writing to the Office of Environmental Assessment, Environmental Technology Division within 45 days after completion of the test. Submit test results signed by the person responsible for the test. [LAC 33:III.5113.B.1]
- 123 Conduct emission tests as set forth in accordance with Test Methods of 40 CFR, parts 60, 61, and 63 or in accordance with alternative test methods approved by DEQ. [LAC 33:III.5113.B.2]
- 124 Provide necessary sampling and testing facilities, exclusive of instruments and sensing devices, as needed to properly determine the emission of toxic air pollutants, upon request of the department. [LAC 33:III.5113.B.3]
- 125 Provide emission testing facilities as specified in LAC 33:III.5113.B.4.a through e. [LAC 33:III.5113.B.4]
- 126 Analyze samples and determine emissions within 30 days after each emission test has been completed. [LAC 33:III.5113.B.5]
- 127 Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of emissions testing. Retain records of emission test results and other data needed to determine emissions. Retained records at the source, or at an alternate location approved by DEQ for a minimum of two years, and make available upon request for inspection by DEQ. [LAC 33:III.5113.B.6]
- 128 Submit notification: Due to the Office of Environmental Assessment, Air Quality Assessment Division, at least 30 days before the emission test. Submit notification of emission test to allow DEQ the opportunity to have an observer present during the test. [LAC 33:III.5113.B.7]
- 129 Maintain and operate each monitoring system in a manner consistent with good air pollution control practices for minimizing emissions. Repair or adjust any breakdown or malfunction of the monitoring system as soon as practicable after its occurrence. [LAC 33:III.5113.C.1]
- 130 Conduct performance evaluation of the monitoring system when required at any other time requested by DEQ. [LAC 33:III.5113.C.2]
- 131 Submit performance evaluation report: Due to the Office of Environmental Assessment, Air Quality Assessment Division, within 60 days of the monitoring system performance evaluation. [LAC 33:III.5113.C.2]
- 132 Submit notification in writing: Due to the Office of Environmental Assessment, Environmental Technology Division at least 30 days before a performance evaluation of the monitoring system is to begin. [LAC 33:III.5113.C.2]
- 133 Install a monitoring system on each effluent or on the combined effluent, when monitoring is required and the effluents from a single source, or from two or more sources subject to the same emission standards, are combined before being released to the atmosphere. If two or more sources are not subject to the same emission standards, install a separate monitoring system on each effluent, unless otherwise specified. If the applicable standard is a mass emission standard and the effluent from one source is released to the atmosphere through more than one point, install a monitoring system at each emission point unless DEQ approves the installation of fewer systems. [LAC 33:III.5113.C.3]
- 134 Evaluate the performance of continuous monitoring systems, upon request by DEQ, in accordance with the requirements and procedures contained in the applicable performance specification of 40 CFR Part 60, appendix B. [LAC 33:III.5113.C.5.a]
- 135 Submit report: Due to DEQ within 60 days of the performance evaluation of the CMS, if requested. Furnish DEQ with two or more copies of a written report of the test results within 60 days. [LAC 33:III.5113.C.5.a]
- 136 Install all continuous monitoring systems or monitoring devices to make representative measurements under variable process or operating parameters, if required to install a CMS. [LAC 33:III.5113.C.5.d]
- 137 Collect and reduce all data as specified in LAC 33:III.5113.C.5.e.i and ii, if required to install a CMS. [LAC 33:III.5113.C.5.e]
- 138 Submit plan: Due to the Office of Environmental Assessment, Air Quality Assessment Division, within 90 days after DEQ requests either the initial plan or an updated plan, if required by DEQ to install a continuous monitoring system. Submit for approval a plan describing the affected sources and the methods for ensuring compliance with the continuous monitoring system. [LAC 33:III.5113.C.5]

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- 139 Maintain records of monitoring data, monitoring system calibration checks, and the occurrence and duration of any period during which the monitoring system is malfunctioning or inoperative. Maintain these records at the source, or at an alternative location approved by DEQ, for a minimum of three years and make available, upon request, for inspection by DEQ. [LAC 33:III.5113.C.7]
- 140 An individual or company contracted to perform a demolition or renovation activity which disturbs RACM must be recognized by the Licensing Board for Contractors to perform asbestos abatement, and shall meet the requirements of LAC 33:III.5151.F.2 and F.3 for each demolition or renovation activity. [LAC 33:III.5151.F.1.f]
- 141 Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency. Due within 30 days after requested by the administrative authority. [LAC 33:III.5611.A]
- 142 During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations. [LAC 33:III.5611.B]
- 143 Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901. [LAC 33:III.5901.A]
- 144 Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur. [LAC 33:III.5907]
- 145 Submit registration: Due to the Department of Environmental Quality, Office of Environmental Compliance, Emergency and Radiological Services Division, within 60 days after the information in the submitted registration is no longer accurate. [LAC 33:III.5911.C]
- 146 Submit amended registration: Due to the Department of Environmental Quality, Office of Environmental Quality, Office of Environmental Quality, Office of Environmental Compliance, Emergency and Radiological Services Division. [LAC 33:III.5911.A]
- 147 Submit Emission Inventory (EI) Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment, Air Quality Assessment Division. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D. [LAC 33:III.919.D]
- 148 Report the unauthorized discharge of any air pollutant into the atmosphere in accordance with LAC 33:III. Chapter 59, Notification Regulations and Procedures for Unauthorized Discharges. Submit written reports to the department pursuant to LAC 33:III.3925. Submit timely and appropriate follow-up reports detailing methods and procedures to be used to prevent similar atmospheric releases. [LAC 33:III.927]
- 149 Provide DEQ with written notice of intention to demolish or renovate prior to performing activities to which 40 CFR 61 Subpart M applies. Delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery is acceptable. [40 CFR 61.145(b)(1)]
- 150 Do not install or reinstall on a facility component any insulating materials that contain commercial asbestos if the materials are either molded and friable or wet-applied and friable after drying. Subpart M. [40 CFR 61.148]
- 151 All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart A. [40 CFR 61]
- 152 All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart a. [40 CFR 63]
- 153 Submit Title V permit application for renewal: Due 180 calendar days before permit expiration date. [40 CFR 70.5(a)(1)(iii)]
- 154 Submit Title V monitoring results report: Due semiannually, by March 31st and September 30th for the preceding periods encompassing July through December and January through June, respectively. Submit reports to the Office of Environmental Compliance, Surveillance Division. Certify reports by a responsible company official. Clearly identify all instances of deviations from permitted monitoring requirements. For previously reported deviations, in lieu of attaching the individual deviation reports, clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. [40 CFR 70.6(a)(3)(iii)(A)]

SPECIFIC REQUIREMENTS

AI ID: 1096 - Monsanto Co - Luling Plant
Activity Number: PER20020007
Permit Number: 2533-V3
Air - Title V Regular Permit Minor Mod

GRP019 Entire Facility

- 155 Submit Title V excess emissions report. Due quarterly, by June 30, September 30, December 31, March 31. Submit reports of all permit deviations to the Office of Environmental Compliance, Surveillance Division. Certify all reports by responsible official in accordance with 40 CFR 70.5(d). The reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by 40 CFR 70.6(a)(3)(iii)(A) as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [40 CFR 70.6(a)(3)(iii)(B)]
- 156 Submit Title V compliance certification. Due annually, by the 31st of March. Submit to the Office of Environmental Compliance, Surveillance Division. [40 CFR 70.6(c)(5)(iv)]
- 157 Service, maintenance, repair, and disposal of appliances containing Class I or II refrigerants shall be conducted in accordance with 40 CFR 82.154-166. [40 CFR 82.154-166]

RLP002 7-82 - CYA Thermal Oxidizer No. 1 Vent

- 158 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.B]
- 159 Emissions of smoke which pass onto or across a public road shall not create a traffic hazard by impairment of visibility or intensify an existing traffic hazard. [LAC 33:III.1103]
- 160 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.C]
- 161 Which Months: All Year Statistical Basis: None specified
- 162 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]
- 163 Comply with the requirements of PSD-LA-623 for PM10 and CO emissions. A BACT analysis for Thermal Oxidizer No. 1 was not required because this oxidizer is a control device. [LAC 33:III.509]
- 164 Permittee shall operate the CYA Thermal Oxidizer No. 1, Emission Point 7-72, within the following parameters whenever ammonia waste gas is fed to the units to achieve a minimum VOC/TAP DRE of 99.2% to comply with LAC 33:III.5109.B.
- First stage temperature 2100 to 2700 degree Fahrenheit.
- Second stage temperature 1700 to 2000 degree Fahrenheit. For a 60 minute period during startup and shutdown a second stage temperature of 1625 degree Fahrenheit is allowed.
- Oxygen content greater than 2%.
- Slip stream valve position greater than 10%.
- Kiln urea feed rate less than 38.0 gpm.
- Residence time greater than 0.5 seconds
- PM10 less than 100 ppm
- CO less than 100 ppm. 60 minute rolling average updated every minute (corrected to 7% oxygen, dry basis)
- These parameters, excluding residence time and PM10, shall be monitored continuously. Compliance shall be determined on an hourly average basis unless otherwise noted.
- Corrective action shall be taken for any operating parameter that drifts out of its specified range. Records of operating parameters, exceedances, and corrective actions shall be maintained on site and available for inspection by the Office of Environmental Compliance Surveillance Division. [LAC 33:III.509, LAC 33:III.5109.B]

SPECIFIC REQUIREMENTS

AI ID: 1096 - Monsanto Co - Luling Plant
Activity Number: PER20020007
Permit Number: 2533-V3
Air - Title V Regular Permit Minor Mod

RLP002 7-82 - CYA Thermal Oxidizer No. 1 Vent

165 Under normal operating conditions, CYA Kiln No. 1 and Urea Storage Tank 101 shall vent to CYA Thermal Oxidizer No. 1, Emission Point 7-82, for 99.2% control. [LAC 33:III.5109.B]

166 Comprehensive Toxic Air Pollutant Emission Control Program. LAC 33:III.5109. Emits Class III TAP only. MACT is not required. DRE is 99.2% for ammonia and VOC. [LAC 33:III.5109]

167 Continuous analyzers shall be installed, maintained, and calibrated to provide continuous record of NO_x, O₂, and CO concentration in the stack gas from the CYA Thermal Oxidizer No. 1, Emission Point 7-82. These analyzers shall comply with the provisions of Performance Specifications 2, 3, and 4 of 40 CFR 60 Appendix B. Parametric monitoring may be used in place of NO_x and CO analyzers if, during compliance testing, a performance correlation acceptable to LDEQ is developed. Records of concentrations shall be maintained on site and available for inspection by the Office of Environmental Compliance Surveillance Division. [PSD-LA-623]. [40 CFR 64.2(3)(b)(1)(vi)]

RLP003 1-96 - #1 Kiln Discharge Hood Jacket Vent

168 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.B]

Which Months: All Year Statistical Basis: None specified

169 Emissions of smoke which pass onto or across a public road shall not create a traffic hazard by impairment of visibility or intensify an existing traffic hazard. [LAC 33:III.1103] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]

Which Months: All Year Statistical Basis: Six-minute average

170 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]

171 Comply with the requirements of PSD-LA-623 for PM10 and CO emissions. BACT for CO emissions is the use of natural gas as fuel. BACT for CO emissions is good design, operation, and combustion practices. This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-623. [LAC 33:III.509]

173 The No. 1 Kiln Discharge Hood Jacket Vent, Emission Point 1-96, shall be maintained and operated with no visible emissions. Vents shall be inspected for visual emissions on a daily basis. If visible emissions are detected, then, within three (3) working days the permittee shall conduct a six minute opacity reading in accordance with EPA Reference Method 9. Records of opacity checks shall include the emission point ID, the date the visual check was performed, a record if visible emissions were detected, and a record and results of any Method 9 testing conducted. These records shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.5109.B]

RLP004 2-96 - #1 Kiln Process Duct Jacket Vent

174 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.B]

Which Months: All Year Statistical Basis: None specified

175 Emissions of smoke which pass onto or across a public road shall not create a traffic hazard by impairment of visibility or intensify an existing traffic hazard. [LAC 33:III.1103] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]

Which Months: All Year Statistical Basis: Six-minute average

SPECIFIC REQUIREMENTS

AI ID: 1096 • Monsanto Co - Luling Plant
Activity Number: PER20020007
Permit Number: 2533-V3
Air - Title V Regular Permit Minor Mod

RLP004 2-96 - #1 Kiln Process Duct Jacket Vent

- 177 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]
- 178 Comply with the requirements of PSD-LA-623 for PM10 and CO emissions. BACT for PM10 emissions is the use of natural gas as fuel. BACT for CO emissions is good design, operation, and combustion practices. This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-623. [LAC 33:III.509]
- 179 The No. 1 Process Duct Jactet Vent, Emission Point 2-96, shall be maintained and operated with no visible emissions. Vents shall be inspected for visual emissions on a daily basis. If visible emissions are detected, then, within three (3) working days the permittee shall conduct a six minute opacity reading in accordance with EPA Reference Method 9. Records of opacity checks shall include the emission point ID, the date the visual check was performed, a record if visible emissions were detected, and a record and results of any Method 9 testing conducted. These records shall be kept on site and available for inspection by the office of Environmental Compliance, Surveillance Division. [LAC 33:III.5109.B]

RLP005 32-96 - CYA Thermal Oxidizer No. 2 Vent

- 180 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.B]
- Which Months: All Year Statistical Basis: None specified
- 181 Emissions of smoke which pass onto or across a public road shall not create a traffic hazard by impairment of visibility or intensify an existing traffic hazard. [LAC 33:III.1103]
- 182 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]
- Which Months: All Year Statistical Basis: Six-minute average
- 183 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]
- 184 Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request. [LAC 33:III.2115.K]
- 185 Comply with the requirements of PSD-LA-623 for PM10 and CO emissions. A BACT for the Thermal Oxidizer No. 2 was not required because this oxidizer is a control device. [LAC 33:III.509]

SPECIFIC REQUIREMENTS

AI ID: 1096 - Monsanto Co - Luling Plant

Activity Number: PER20020007

Permit Number: 2533-V3

Air - Title V Regular Permit Minor Mod

RLP005 32-96 - CYA Thermal Oxidizer No. 2 Vent

186 Permittee shall operate the CYA Thermal Oxidizer No. 2, Emission Point 32-96, within the following parameters whenever ammonia waste gas is fed to the units to achieve a minimum VOC/TAP DRE of 99.2% to comply with LAC 33:III.5109.B.
First stage temperature 21.00 to 2700 degree Fahrenheit.

Second stage temperature 1700 to 2000 degree Fahrenheit. For a 60 minute period during startup and shutdown a second stage temperature of 1625 degree Fahrenheit is allowed.
Oxygen content greater than 2%.
Slip stream valve position greater than 10%.

Kiln urea feed rate less than 38.0 gpm.

Residence time greater than 0.5 seconds

PM10 less than 100 ppm

CO less than 100 ppm. 60 minute rolling average updated every minute (corrected to 7% oxygen, dry basis)

These parameters, excluding residence time and PM10, shall be monitored continuously. Compliance shall be determined on an hourly average basis unless otherwise noted. Corrective action shall be taken for any operating parameter that drifts out of its specified range. Records of operating parameters, exceedances, and corrective actions shall be maintained on site and available for inspection by the Office of Environmental Compliance Surveillance Division. [LAC 33:III.5109.B, LAC 33:III.509]

187 Under normal operating conditions, CYA Kiln No. 2 shall vent to CYA Thermal Oxidizer No. 2, Emission Point 32-96, for 99.2% control. [LAC 33:III.5109.B]

188 Comprehensive Toxic Air Pollutant Emission Control Program. LAC 33:III.5109. Emits Class III TAP only. MACT is not required. DRE is 99.2% for ammonia and VOC. [LAC 33:III.5109]

189 Recordkeeping and reporting requirements per 40 CFR 60.48c(a)(1), 60.48c(a)(3), and 60.48c(g) apply. [40 CFR 60.48(a)(1), 40 CFR 60.48(a)(3), 40 CFR 60.48(e)]

190 Continuous analyzers shall be installed, maintained, and calibrated to provide continuous record of NOx, O2, and CO concentration in the stack gas from the CYA Thermal Oxidizer No. 2, Emission Point 32-96. These analyzers shall comply with the provisions of Performance Specifications 2, 3, and 4 of 40 CFR 60 Appendix B. Parametric monitoring may be used in place of NOx and CO analyzers if, during compliance testing, a performance correlation acceptable to LDEQ is developed. Records of concentrations shall be maintained on site and available for inspection by the Office of Environmental Compliance Surveillance Division. [PSD-LA-623]. [40 CFR 64.2(3)(b)(1)(vi)]

RLP006 4-97 - #2 Kiln Discharge Hood Jacket Vent

191 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.B]

Which Months: All Year Statistical Basis: None specified

192 Emissions of smoke which pass onto or across a public road shall not create a traffic hazard by impairment of visibility or intensify an existing traffic hazard. [LAC 33:III.1103]
193 Opacity <= 20 percent, except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]

Which Months: All Year Statistical Basis: Six-minute average

194 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III. Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]

195 Comply with the requirements of PSD-LA-623 for PM10 and CO emissions. BACT for PM10 emissions is the use of natural gas as fuel. BACT for CO emissions is good design, operation, and combustion practices. This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-623. [LAC 33:III.509]

SPECIFIC REQUIREMENTS

AI ID: 1096 - Monsanto Co - Luling Plant

Activity Number: PER20020007

Permit Number: 2533-V3

Air - Title V Regular Permit Minor Mod

RLP006 4-97 - #2 Kiln Discharge Hood Jacket Vent

196 The No. 2 Kiln Discharge Hood Jacket Vent, Emission Point 4-97, shall be maintained and operated with no visible emissions. Vents shall be inspected for visual emissions on a daily basis. If visible emissions are detected, then, within three (3) working days the permittee shall conduct a six minute opacity reading in accordance with EPA Reference Method 9. Records of opacity checks shall include the emission point ID, the date the visual check was performed, a record if visible emissions were detected, and a record and results of any Method 9 testing conducted. These records shall be kept on site and available for inspection by the office of Environmental Compliance, Surveillance Division. [LAC 33:III.5109.B]

RLP007 5-97 - #2 Kiln Process Duct Jacket Vent

197 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.B]

Which Months: All Year Statistical Basis: None specified

198 Emissions of smoke which pass onto or across a public road shall not create a traffic hazard by impairment of visibility or intensify an existing traffic hazard. [LAC 33:III.1103]

199 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]

Which Months: All Year Statistical Basis: Six-minute average

200 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]

201 Comply with the requirements of PSD-LA-623 for PM10 and CO emissions. BACT for PM10 emissions is the use of natural gas as fuel. BACT for CO emissions is good design, operation, and combustion practices. This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-623. [LAC 33:III.509]

202 The No. 2 Process Duct Jacket Vent, Emission Point 5-97, shall be maintained and operated with no visible emissions. Vents shall be inspected for visual emissions on a daily basis. If visible emissions are detected, then, within three (3) working days the permittee shall conduct a six minute opacity reading in accordance with EPA Reference Method 9. Records of opacity checks shall include the emission point ID, the date the visual check was performed, a record if visible emissions were detected, and a record and results of any Method 9 testing conducted. These records shall be kept on site and available for inspection by the office of Environmental Compliance, Surveillance Division. [LAC 33:III.5109.B]